

ESTTA Tracking number: **ESTTA471601**

Filing date: **05/09/2012**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92053314
Party	Defendant Christian Faith Fellowship Church
Correspondence Address	RICHARD W YOUNG QUARLES BRADY LLP 300 NORTH LASALLE STREET, SUITE 4000 CHICAGO, IL 60654 UNITED STATES Richard.Young@Quarles.com, veronica.brooks@quarles.com
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Signature	/Richard W. Young/
Date	05/09/2012
Attachments	Respondent's Response to Petitioner's Motion for Summary and Cross Motion for Summary Judgment.pdf (11 pages)(678345 bytes) Declaration of Craig Mason.pdf (9 pages)(7468189 bytes) Declaration of John Conour.pdf (78 pages)(2472831 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the Matter of Registration Nos. 3,173,207 and 3,173,208

Mark: ADD A ZERO and ADD A ZERO & Design

Date of Registration: November 21, 2006

Adidas AG)	
)	
Petitioner,)	
)	
v.)	Cancellation No. 92053314
)	
Christian Faith Fellowship Church)	
)	
Respondent.)	

**RESPONDENT'S RESPONSE TO PETITIONER'S MOTION FOR SUMMARY
JUDGMENT AND CROSS MOTION FOR SUMMARY JUDGMENT**

Respondent, Christian Faith Fellowship Church, responds to Petitioner's Motion for Summary Judgment and moves for summary judgment that its U.S. Trademark Registrations No. 3,173,207, for "ADD A ZERO" and No. 3,173,208 for "ADD A ZERO" & Design are valid and not subject to cancellation.

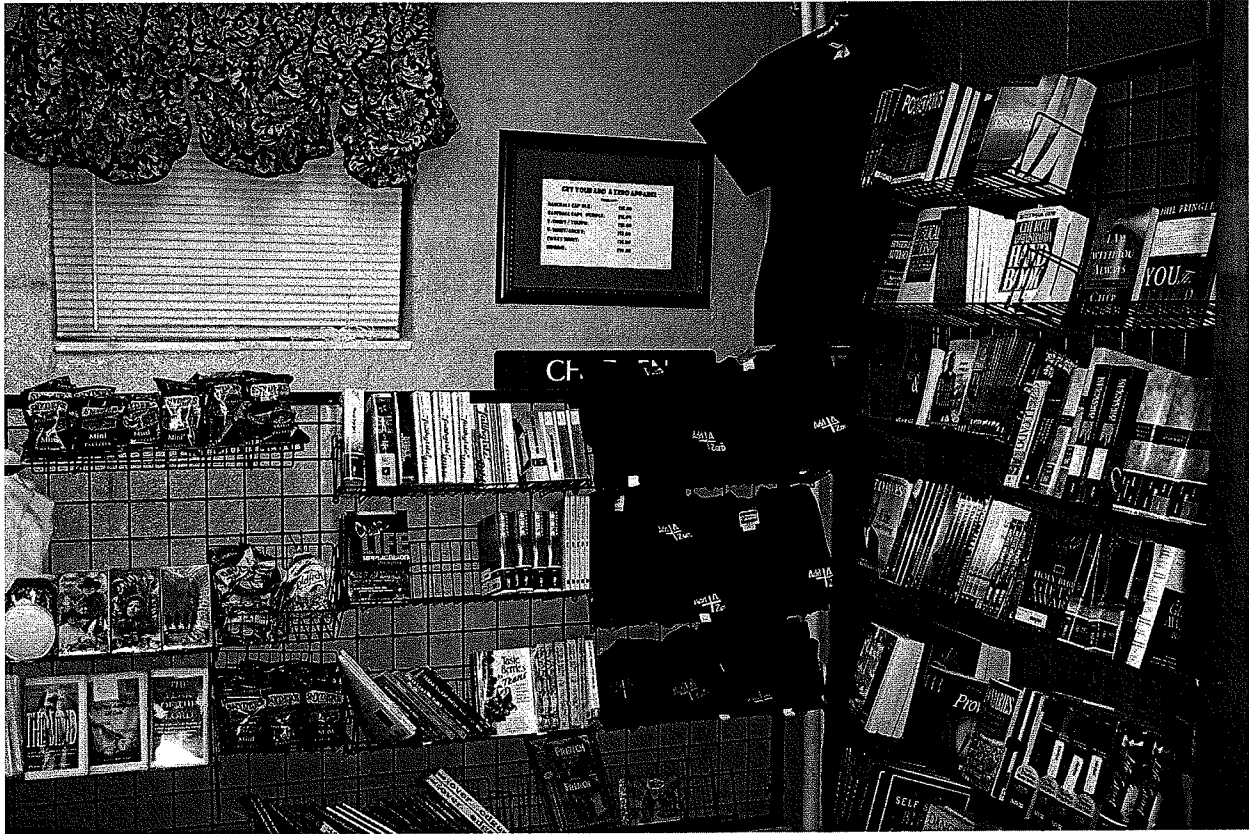
I. STATEMENT OF UNDISPUTED FACTS

The Christian Faith Fellowship Church was established in 1997 in Zion, Illinois, near the Wisconsin state line. (Mason Dep. 16; Mason Decl. ¶3) The congregation of the church has

grown steadily and now includes more than 1200 members. (Mason Dep. 20; Mason Decl. ¶3) Its diverse parishioners include residents of the states of Wisconsin and Illinois, as well as naval cadets from throughout the country who are stationed at the Naval Training Center, Great Lakes, located in North Chicago, Illinois. (Mason Dep. 136; Mason Decl. ¶3) The church is not an affluent congregation but rather is a working class church in a working class community. (Mason Decl. ¶3) Nevertheless, the church has provided both a food pantry and a day care to the community. (Mason Decl. ¶3)

Inspired by the prophetic words of an evangelist spoken in 2003, Pastor Edward Logan launched a plan to use the trademarks “ADD A ZERO” on caps and shirts sold to raise money for the church’s building fund campaign. (Mason Dep. 84-86; Mason Decl. ¶4) The building fund campaign, which is on-going, will help the church expand its facilities to meet the needs of the growing congregation. (Mason Dep. 86; Mason Decl. ¶4) In late 2004, the church, working with an apparel vendor, designed a stylized logo featuring its ADD A ZERO trademark (Mason Decl. ¶4). It commissioned the vendor to produce caps, sweatshirts, and T-shirts with the logo and began selling its ADD A ZERO branded apparel in the church’s bookstore (see picture below), selling its first items on January 9, 2005. (CFFC0001, CFFC0099, and CFFC0128; Mason Decl. ¶4) Caps from the first order of ADD A ZERO apparel were made in the Dominican Republic. (Mason Decl. ¶4) The hooded sweatshirts came from El Salvador (Mason Decl. ¶4). Except for a brief period of time in 2008 when the bookstore was closed, the ADD A ZERO apparel has been on display and for sale in the bookstore continuously ever since. (Mason Dep. 76; Mason Decl. ¶5) ADD A ZERO apparel has been sold every year since its introduction in 2005 except for the year when the bookstore was closed. (CFFC0001-0018; Mason Decl. ¶5) Although sales have been modest, revenue from the ADD A ZERO apparel

sales is important to the church's growth plans. (Mason Decl. ¶5) Applications to register "ADD A ZERO" and "ADD A ZERO" & Design, were filed in March 2005. (CFFC0139 and CFFC0142)¹



ADD A ZERO apparel has been for sale and sold in the church's bookstore beginning in January 2005. (CFFC0001, CFFC0099, and CFFC0128; Mason Decl. ¶4)

The church originally promoted its ADD A ZERO apparel through in-store displays in the bookstore, video display in the sanctuary, and spoken words to the church's members at church services and events. (Logan Dep. 13-14; Mason Decl. ¶6) In an effort to expand sales,

¹ Petitioner argues based on several non-precedential T.T.A.B. decisions that the church's trademark applications are void *ab initio* for lack of use of the ADD A ZERO marks on pants. Petitioner is mistaken, as the T.T.A.B. made clear in *Grand Canyon West Ranch, LLC v. Hualapai Tribe*, which is citable as precedent. 78 U.S.P.Q.2d 1696 (T.T.A.B. 2006). In *Grand Canyon*, the T.T.A.B. held that in the absence of fraud, "as long as the mark was used on some of the identified goods . . . as of the filing of the application, the application is not void in its entirety." *Id.* Applicant is currently deleting "pants" from the goods identification in both registrations through filing of its Section 8 affidavits.

the church began making plans in 2008 to launch an e-store on its website where members, former members and consumers from around the world could purchase ADD A ZERO apparel. (Mason Dep. 81; CFFC0027-28; Mason Decl. ¶6) Relying on the efforts of church members who volunteered their time after work, progress was slow. (Mason Decl. ¶6) In late 2008, the church's server crashed. (Mason Decl. ¶6) Then, the primary website developer died. (Mason Decl. ¶6) But the e-store finally went live with ADD A ZERO apparel in 2010, making the branded apparel available to purchasers everywhere. (Mason Decl. ¶6) The church has received orders and shipped ADD A ZERO branded apparel throughout the United States. (Response to Interrogatory No. 7; Mason Decl. ¶6) The church has continued and intends to continue its sale of its ADD A ZERO apparel. (CFFC0001-0018; Mason Dep. 100-102; Mason Decl. ¶6)²

II. ARGUMENT

Summary judgment is an appropriate method of disposing of cases in which there are no genuine issues of material fact in dispute, thus leaving the case to be resolved as a matter of law. *See* Fed. R. Civ. P. 56(c). The evidence must be viewed in a light favorable to the nonmoving party, and all justifiable inferences are to be drawn in the nonmovant's favor. *See Opryland USA Inc. v. Great American Music Show Inc.*, 970 F.2d 847, 23 USPQ2d 1471 (Fed. Cir. 1992); and *Olde Tyme Foods Inc. v. Roundy's Inc.*, 961 F.2d 200, 22 USPQ2d 1542 (Fed. Cir. 1992).

² Petitioner's Statement of Uncontested Facts largely relies on the transcripts of the depositions of Mr. Logan and Mr. Mason, which it characterizes as 30(b)(6) depositions of the church and therefore binding on the church. Petitioner is mistaken. The depositions were the individual depositions of Mr. Logan and Mr. Mason and not taken pursuant to Rule 30(b)(6). (Conour Decl. ¶¶4 and 11)

A. THE ADD A ZERO REGISTRATIONS ARE VALID

The ADD A ZERO trademark registrations are presumed valid under 15 U.S.C. § 1057. *Shutemdown Sports, Inc. v. Lacy*, 92049692 (TTAB 2-22-2012). To defeat that presumption, Petitioner, adidas AG, must show by a preponderance of the evidence that the registrations are invalid. *Keebler Co. v. Rovira Biscuit Corp.*, 624 F.2d 366 (1st Cir. 1980). On summary judgment, that evidence must be undisputed. Adidas alleges that the registrations are invalid because the marks were not “used in commerce” at the time that the applications for registration were filed in March 2005.

“Use in commerce,” for purposes of federal trademark jurisdiction, encompasses “commerce that may be regulated by the United States Congress,” T.B.E.P. § 901.03, including intrastate sales of goods and services that affect interstate commerce. Thus, in *In re Gastown, Inc.*, the Federal Circuit’s predecessor court, the Court of Customs and Patent Appeals, held that a service mark for automotive services was entitled to registration when the automotive services were sold in a single state to persons moving in interstate commerce because the services affected interstate commerce. 326 F.2d 780 (C.C.P.A. 1964). In discussing its *Gastown* decision, the C.C.P.A. later explained that “it logically follows that goods are “sold or transported in commerce” when their sale or transportation directly affects interstate or other commerce which may lawfully be regulated by Congress.” *Matter of Application of Silenus Wines*, 557 F.2d 806, 808 (C.C.P.A. 1977)(“*Gastown*’s rationale is not limited to services”).

In *Silenus Wines*, the C.C.P.A. reversed the refusal to register a mark for imported wine sold intrastate. 557 F.2d at 807-809. The central issue decided by the C.C.P.A. was “whether the intrastate sale . . . , namely the intrastate sale of imported wine by the importer directly affects commerce lawfully regulated by Congress.” *Id.* at 808-809. The court reasoned that while the

“importation [was] not itself a ‘use in commerce’ . . . , it [was] evidence that appellant’s sale within Massachusetts was so intimately involved with foreign commerce as to become a ‘use in commerce’ as defined in the Lanham Act.” *Id.* at 809. The court reversed the Board, holding that “intrastate sale of goods, by the party who caused those goods to move in regulatable commerce, directly affects commerce and is itself regulatable.” “Intrastate sale of imported wines by the importer,” said the court, “sufficiently affects commerce with foreign nations to qualify those intrastate sales for the Trademark Act definition of ‘commerce.’” *Id.* at 809.

The facts of *Silenus Wines* are very similar to the facts here. In December 2004, the church purchased ADD A ZERO apparel, including caps, crew neck sweatshirts, and hooded sweatshirts from ICON industries. (CFFC0099 and 0128) The apparel was labeled with the ADD A ZERO marks by ICON Industries, and sold in the church’s bookstore beginning January 9, 2005, when five ADD A ZERO caps, three ADD A ZERO hooded sweatshirts, and an ADD A ZERO crew sweatshirt were sold. (CFFC0001; Mason Dep. 25 and 53) At least the caps and hooded sweatshirts were supplied by foreign manufacturers (Mason Decl. ¶4) The sale of foreign-made merchandise in the church’s bookstore directly affected foreign commerce and could lawfully be regulated by Congress. Accordingly, under *Silenus Wines*, the church’s ADD A ZERO marks were used in commerce prior to March, 2005 when the trademark applications were filed. (CFFC0139 and CFFC0142)

The church’s sale and offer for sale of ADD A ZERO apparel in its bookstore affected interstate commerce and could lawfully be regulated by Congress in other ways as well. The apparel was promoted and sold to members of the church’s congregation who travelled to the church in Zion, Illinois from their homes in Wisconsin and elsewhere. (Mason Dep. 136; Mason Decl. ¶¶3 and 6) Goods are sold in interstate commerce regulatable by Congress when they are

sold to interstate travelers. *Matter of Application of Silenus Wines*, 557 F.2d 806, 808. Thus, the church's sale of ADD A ZERO apparel to residents of other states who traveled to the church's bookstore in Illinois constitutes "use in commerce" under the Lanham Act. See also *Larry Harmon Pictures Corp. v. The Williams Restaurant Corp.*, 929 F.2d 662 (Fed. Cir. 1991) (restaurant services provided in one state to interstate customers constitutes use in commerce).

B. THE ADD A ZERO MARKS HAVE NOT BEEN ABANDONED

It is undisputed that ADD A ZERO apparel was sold every year since its introduction in 2005 except for 2008, when the church's bookstore was closed. (CFFC0001-0018; Mason Dep. 76; Mason Decl. ¶5) Use of the ADD A ZERO marks has *never* been discontinued much less discontinued with an intent not to resume use. 15 U.S.C. § 1127. Abandonment requires "complete cessation or discontinuance of trademark use," such that even a "single bona fide use of a mark is sufficient against a claim of abandonment." *American Assn. for Justice v. A. Trial Law. Assn.*, 698 F. Supp.2d 1129, 1138 (Minn. 2-18-2010) (quoting *Electro Source, LLC v. Brandess-Kalt-Aetna Group, Inc.*, 458 F.3d 931, 937 (9th Cir. 2006)). The church's sales of ADD A ZERO apparel may appear modest, particularly compared to the multiple billions of dollars of sales of the multinational sports apparel goliath that seeks to cancel the church's registrations. But they are bona fide uses nonetheless, sufficient to maintain the church's rights in its marks.

Although the church's sales have been modest, it is not for lack of trying. The ADD A ZERO apparel has been on display and offered for sale continuously (except a brief period in 2008) in the church's bookstore. (CFFC 0001-0018; Mason Decl. ¶5) Offering the branded apparel for sale, even in the absence of any sales, is sufficient to defeat a claim of abandonment.

In *Daybrook-Ottawa Corp. v. F.A.B. Mfg. Co.*, 152 U.S.P.Q. 441, 443 (T.T.A.B. 1966), the Trademark Trial and Appeal Board found that a company did not abandon its trademark when it continued to offer its trademarked products for sale for a period of *four* years without a sale, reasoning that the company's "failure to [sell] was occasioned by the lack of a demand for the product at the time rather than to any intent on the [company's] part to abandon the sale thereof under the mark." See also *International Stamp Art, Inc. v. U. S. Postal Service*, 2005 WL 3947951, at *6 (N.D. Ga. May 27, 2005) ("a plaintiff does not abandon a mark just because it has not succeeded in selling the product featuring the trademark;" actual sales "are not the only way in which a mark may be 'used.')" (quoting *Cumulus Media, Inc. v. Clear Channel Communications, Inc.*, 304 F.3d 1167, 1175 n. 10 (11th Cir. 2002)). The church's actual sales as well as its efforts to sell its ADD A ZERO apparel each constitutes bona fide use of its marks.

Since the church never discontinued its use of its marks, "the intent not to resume use prong of abandonment does not come into play." *Carter-Wallace, Inc. v. Proctor & Gamble Co.*, 434 F.2d 794, 937-938 (9th Cir. 1970). Even so, the church has never intended to discontinue its sale of ADD A ZERO apparel. All of the evidence establishes the church's intention to continue sale of the apparel and use of the ADD A ZERO marks.³

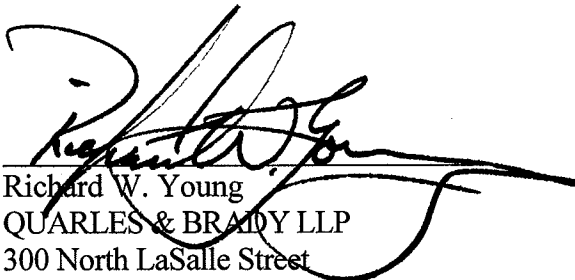
³ To argue the church had no intent to resume use of its ADD A ZERO marks, Petitioner relies on its hired investigator's report of alleged telephone conversations with a mysterious, non-existent person named "Labella" and an administrative assistant, Ora Brown who had no involvement in the church's bookstore, is neither a director nor a decision maker for the church, and is not competent to speak for the church regarding its ADD A ZERO marks (see Bridges declaration). The Bridges declaration discussion of the "Labella" and Ora Brown interviews amounts to nothing more than a third-hand report of an unknown person and someone who is not competent to speak for the church regarding its ADD A ZERO marks, respectively. Therefore, the Bridges declaration is inadmissible and has no probative value with respect to the church's intent to use its ADD A ZERO marks. A "third-hand report of a statement made by an unknown representative of registrant is inadmissible hearsay which can be accorded no probative value" *In re American Olean Tile Co.*, 1 USPQ2d 1823, 1824 n.2 (TTAB 1986). This is also true when there is no "evidence as to [a] representative's competency to speak for [registrant] regarding its registered mark." *Id.*

For the past more than seven years, the ADD A ZERO apparel has been for sale in the church's bookstore. There is no credible evidence whatsoever that the apparel was being discontinued. Like any clothing retailer, the church was selling the apparel in its inventory. In 2008, when the church's bookstore was closed, the church was developing an e-store on which ADD A ZERO merchandise would be sold. (Mason Dep. 81; CFFC0027-28; Mason Decl. ¶6) The e-store was to be included in a new website. (Mason Dep. 81; CFFC0027-28; Mason Decl. ¶6) Although it took another two years before the new site went live, the church never discontinued its ADD A ZERO apparel, never intended to discontinue its use of ADD A ZERO and never abandoned its ADD A ZERO marks. The goals of the building fund campaign have not been met. (Mason Decl. ¶4) Construction has not started, and the church continues to work to build the fund. (Mason Decl. ¶4) Just as it continues to raise money to expand the church's facilities, it works to generate revenue for the building fund from the promotion and sale of its ADD A ZERO apparel. (Mason Decl. ¶¶4 and 6)

III. CONCLUSION

For the foregoing reasons, the Petitioner's motion for summary judgment should be denied and Respondent's cross-motion for summary judgment that the registrations are valid and not subject to cancellation should be granted.

Dated: May 9, 2012



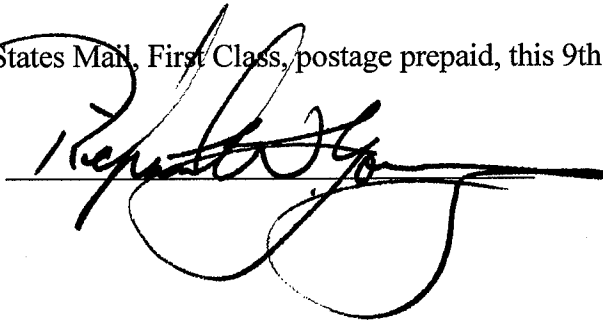
Richard W. Young
QUARLES & BRADY LLP
300 North LaSalle Street
Suite 4000
Chicago, Illinois 60654
(312) 715-5000
Attorney for Respondent

CERTIFICATE OF SERVICE

The undersigned attorney states that a copy of the foregoing RESPONSE TO PETITIONER'S MOTION FOR SUMMARY JUDGMENT AND CROSS MOTION FOR SUMMARY JUDGMENT was served upon

Angelo Notaro
Notaro, Michalos & Zaccaria P.C.
100 Dutch Hill Road
Orangeburg, New York 10962

by depositing a copy thereof in the United States Mail, First Class, postage prepaid, this 9th day of May, 2012.

A handwritten signature in black ink, appearing to read 'Richard J. Go...', is written over a horizontal line.

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the Matter of Registration Nos. 3,173,207 and 3,173,208

Mark: ADD A ZERO and ADD A ZERO & Design

Date of Registration: November 21, 2006

Adidas AG)	
)	
Petitioner,)	
)	
v.)	Cancellation No. 92053314
)	
Christian Faith Fellowship Church)	
)	
Respondent.)	

DECLARATION OF CRAIG MASON

I, CRAIG MASON, hereby declare:

1. I am fully familiar with the facts in this declaration based on my own personal knowledge.
2. I am the Executive Pastor of the Christian Faith Fellowship Church in Zion, IL.
3. The Christian Faith Fellowship Church was established in 1997 in Zion, Illinois, near the Wisconsin state line. The congregation of the church has grown steadily and now includes more than 1200 members. The congregation includes residents of the states of Wisconsin and Illinois, as well as naval cadets from throughout the country who are stationed at the Naval Training Center, Great Lakes, located in North Chicago, Illinois. The church is not an

affluent congregation but rather is a working class church in a working class community. The church has provided both a food pantry and a day care to the community. The church has a number of employees, including Ora Brown, who works as an administrative assistant. Ora Brown has no involvement in or responsibility for the operations of the church's bookstore. To my knowledge, the church has never employed a person named "Labella."

4. Inspired by the prophetic words of an evangelist spoken in 2003, Pastor Edward Logan launched a plan to use the trademarks "ADD A ZERO" on caps and shirts sold to raise money for the church's building fund campaign. The building fund campaign is on-going and will help the church expand its facilities to meet the needs of the church's growing congregation. In late 2004, the church, working with an apparel vendor, designed a stylized logo featuring its ADD A ZERO trademark. The apparel vendor was commissioned to produce caps, sweatshirts, and T-shirts with the logo. Caps from the first order of ADD A ZERO apparel were made in the Dominican Republic (Exhibit A). The hooded sweatshirts came from El Salvador (Exhibit B). The church began selling its ADD A ZERO branded apparel in its bookstore, selling its first items on January 9, 2005 (a picture of the bookstore with ADD A ZERO apparel on display is attached as Exhibit C).

5. Except for a brief period of time in 2008 when the bookstore was closed, the ADD A ZERO apparel has been on display and for sale in the bookstore continuously ever since. ADD A ZERO apparel has been sold every year since its introduction in 2005 except for the year when the bookstore was closed. Although sales have been modest, the revenue from the ADD A ZERO apparel sales is important to the church's growth plans.

6. The church originally promoted its ADD A ZERO apparel through in-store displays in the bookstore, video display in the sanctuary, and spoken words to the church's members at church services and events. In 2008, the church began making plans to launch an e-store on its website that would allow consumers to purchase ADD A ZERO apparel. Relying on the efforts of church members who volunteered their time after work, progress was slow. In late 2008, the church's server crashed. Then, the primary website developer died. But the e-store finally went live with ADD A ZERO apparel in 2010, making the branded apparel available to

purchasers everywhere. The church has received orders and shipped ADD A ZERO branded apparel throughout the United States. The church has continued and intends to continue its sale of its ADD A ZERO apparel.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on May 9, 2012



Craig Mason

EXHIBIT A

OF MASON DECLARATION

FLEXFIT®

63% POLYESTER
34% COTTON/3% P.U. SPANDEX
PATENT

BY  **YUPOONG**

MADE IN DOMINICAN REP.

L-XL

EXHIBIT B

OF MASON DECLARATION

90% ALGODON PRE-ENCOGIDO
10% POLIESTER
HECHO EN EL SALVADOR

PRÉRÉTRÉCI 90% COTON
10% POLYESTER
FABRIQUÉ AU SALVADOR

90% PRESHRUNK COTTON
10% POLYESTER
MADE IN EL SALVADOR

ADULT 2XL (50-52)/2T

EXHIBIT C

OF MASON DECLARATION



GET YOUR ADD A ZERO APPAREL

BLANKET CAP SET:	PRICED LOW
BLANKET CAP SET: FRONT:	\$15.00
T-SHIRT / T-SHIRT:	\$15.00
T-SHIRT / T-SHIRT:	\$15.00
T-SHIRT / T-SHIRT:	\$15.00
T-SHIRT / T-SHIRT:	\$15.00
T-SHIRT / T-SHIRT:	\$15.00
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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the Matter of Registration Nos. 3,173,207 and 3,173,208
Mark: ADD A ZERO and ADD A ZERO & Design
Date of Registration: November 21, 2006

Adidas AG,)	
)	
Petitioner,)	
)	
v.)	Cancellation No. 92053314
)	
Christian Faith Fellowship Church,)	
)	
Respondent.)	

DECLARATION OF JOHN E. CONOUR

I, JOHN E. CONOUR, hereby declare:

1. I am fully familiar with the facts in this declaration based on my own personal knowledge.
2. I am one of the attorneys representing Respondent Christian Faith Fellowship Church in the above-captioned matter.
3. This declaration is submitted in support of Respondent's Response to Petitioner's Motion for Summary Judgment and Cross-motion for Summary Judgment.
4. A true and accurate copy of the Notice of Deposition of Craig Mason and pages from the transcript of the deposition of Craig Mason taken in this proceeding is attached hereto as Exhibit A.

5. A true and accurate copy of a report entitled "Christian Faith Fellowship Church Bookstore Receipt Journal with Item Detail," produced by Respondent in this proceeding and corresponding to Bates numbers CFFC0001-18 is attached hereto as Exhibit B.

6. A true and accurate copy of a report entitled "CFFC Website Roadmap," produced by Respondent in this proceeding and corresponding to Bates numbers CFFC0027-28 is attached hereto as Exhibit C.

7. A true and accurate copy of an email dated December 9, 2004 with Subject Line "Add-A-Zero Prices," produced by Respondent in this proceeding and corresponding to Bates number CFFC0099 is attached hereto as Exhibit D.

8. A true and accurate copy of a report entitled "Add A Zero Qbooks Report," produced by Respondent in this proceeding and corresponding to Bates number CFFC0128 is attached hereto as Exhibit E.

9. A true and accurate copy of Respondent's Registration No. 3,173,207 for "ADD A ZERO," produced by Respondent in this proceeding and corresponding to Bates number CFFC0139 is attached hereto as Exhibit F.

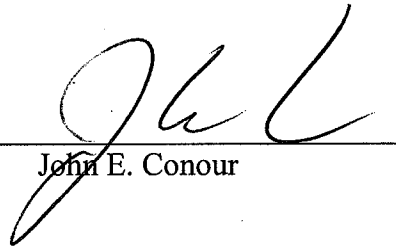
10. A true and accurate copy of Respondent's Registration No. 3,173,208 for "ADD A ZERO" & Design, produced by Respondent in this proceeding and corresponding to Bates number CFFC0142 is attached hereto as Exhibit G.

11. A true and accurate copy of the Notice of Deposition of Edward Logan and pages from the transcript of the deposition of Edward Logan taken in this proceeding is attached hereto as Exhibit H.

12. A true and accurate copy of Respondent's Answer to Petitioner's First Interrogatories to Respondent, produced by Respondent in this proceeding is attached as Exhibit I.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on May 9, 2012



John E. Conour

EXHIBIT A

OF CONOUR DECLARATION

Cancellation No. 92053314

**NOTICE OF DEPOSITION OF
CRAIG MASON**

TO: Richard W. Young, Esq.
Quarles & Brady LLP
300 North LaSalle Street, Suite 4000
Chicago, Illinois 60654

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure, Petitioner adidas AG, will take the deposition of Craig Mason, commencing at 9:00 a.m. on March 1, 2012 at the offices of Veritext, 1 North LaSalle St., Suite 400, Chicago, Illinois 60602.

The deposition will be taken upon oral examination before an officer duly authorized to administer oaths and record the testimony by stenographic transcription.

Dated: January 30, 2012

Respectfully submitted,



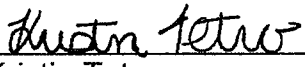
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Notaro, Michalos & Zaccaria P.C.
100 Dutch Hill Road
Orangeburg, New York 10962
Tel: (845) 359-7700

Attorneys for Petitioner

CERTIFICATE OF SERVICE

It is hereby certified that a copy of the foregoing **NOTICE OF DEPOSITION OF CRAIG MASON** has been served by causing a copy thereof to be sent first class mail, postage prepaid, on January 30, 2012 addressed to:

Richard W. Young, Esq.
Quarles & Brady LLP
300 North LaSalle Street, Suite 4000
Chicago, Illinois 60654



Kristin Tetro

COPY

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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In the matter of Registration Nos. 3,173,207 and
3,173,208 for the mark ADD A ZERO and

ADD A ZERO & DESIGN

ADIDAS AG,

Petitioner,

vs.

CHRISTIAN FAITH

FELLOWSHIP CHURCH,

Respondent .

The deposition of CRAIG MASON, called for examination taken pursuant to the provisions of the Code of Civil Procedure and the Rules of the Supreme Court of the State of Illinois pertaining to the taking of depositions for the purpose of discovery taken before RAELENE STAMM, CSR No. 084-004445, Certified Shorthand Reporter licensed by the State of Illinois, on the 29th day of February, 2012, at One North LaSalle Street, Suite 400, Chicago, Illinois, at the hour of 9:30 a.m.

1 A. Primarily men's suits, dress shirts, ties,
2 pants.

3 Q. Where was that business located?

4 A. It was located in my home.

5 Q. I see.

6 And how did you sell those products?

7 A. Primarily by word of mouth. I tried the
8 internet for a little while, wasn't very successful
9 with that. But that's the two avenues, but
10 primarily by word of mouth.

11 Q. Okay. And going back to the buildings of
12 the CFFC, where are they located?

13 A. The church buildings are located in Zion,
14 Illinois.

15 Q. Is the CFFC a corporation?

16 A. Christian Faith Fellowship Church Waukegan
17 is a corporation. We also have assumed the
18 business name of Christian Faith Fellowship Church.

19 Q. Which entity is the owner of the
20 trademarks at issue in this proceeding?

21 A. Christian Faith Fellowship Church.

22 Q. What state is it incorporated?

23 A. In the state of Illinois.

24 Q. Is it a not-for-profit corporation?

1 A. Full and part time.

2 Q. And how many members does CFFC have in its
3 congregation approximately?

4 A. I think 1200 to maybe 1500.

5 Q. And does that include only parishioners at
6 the Zion church?

7 A. No.

8 Q. What does that include?

9 A. We have two church plants that have
10 been -- two churches that have been planted in the
11 last two years. So I guess their membership is
12 probably, I don't know, it's kind of -- they're
13 still attached. They're not independent churches,
14 put it that way. So they do fellowship with us at
15 the main church as well.

16 Q. Which is the main church?

17 A. The church located in Zion.

18 Q. Okay. And what is the other church?

19 A. We have a church plant in Round Lake,
20 Illinois, and one recently started in Evanston,
21 Illinois.

22 Q. And do those churches go under different
23 names?

24 A. One does.

1 Q. Do you know of anything responsive to the
2 request that you could not locate?

3 A. None that I can recall.

4 Q. Has the CFFC provided us with all of the
5 documents that it found that were responsive to the
6 request?

7 A. To my knowledge, yes.

8 Q. Do you know if anyone has documents
9 responsive to the request that were not produced?

10 A. I don't know.

11 Q. When was Add A Zero first used by the CFFC
12 on products?

13 A. I believe 2005.

14 Q. What are the products that CFFC has used
15 Add A Zero on?

16 A. Can you rephrase the question?

17 Q. Has the -- have the words Add A Zero been
18 placed on products?

19 A. Yes.

20 Q. What products has the words Add A Zero
21 been placed on?

22 A. Baseball caps, hooded sweatshirts,
23 sweatshirts, T-shirts.

24 Q. Anything else?

1 Department 61 or 112. Those are particular -- to
2 be honest, I don't know how they use it. It's
3 something that the manager uses in the bookstore.

4 Q. Okay. Vendor name refers to the vendor
5 for whom the product was purchased; is that
6 correct?

7 A. Yes.

8 Q. And what period of time does Exhibit 6
9 cover?

10 A. It's a query report from -- dated
11 January 1, 2005, to July 22, 2011.

12 Q. Does Exhibit 6 reflect all sales of
13 Add A Zero apparel during that period of time?

14 A. It shows the sale of all Add A Zero
15 apparel that was processed through the bookstore
16 computer.

17 Q. And how many Add A Zero caps were
18 processed through the bookstore in that period of
19 time?

20 A. The report states 96.

21 Q. And how many Add A Zero crews were
22 processed by the bookstore during that same period
23 of time?

24 A. The report states 58.

1 Q. Okay. When you generated this report, is
2 there a reason you did not show the headings for
3 the last three columns?

4 A. No. I don't know if the report generates
5 it or not. I was querying the words Add A Zero.

6 Q. Did you review the report before you
7 produced it in response to Adidas' document
8 request?

9 A. Yes.

10 Q. And did you notice that there was no
11 heading for the last three columns?

12 A. I don't recall. My focus was on the sale
13 items.

14 Q. Can the total revenues for sales of
15 Add A Zero merchandise through July 22, 2011, be
16 determined from Exhibit 7?

17 A. Yes, by totaling up the receipt total
18 column.

19 Q. Why were there no sales of Add A Zero
20 merchandise in 2008?

21 A. I'm not sure. There's a period of time
22 that the store was closed. I'm not sure. I
23 haven't been able to identify the actual dates that
24 the store was closed.

1 Add A Zero apparel in 2007?

2 A. They were made available in the bookstore
3 in 2007.

4 Q. Anything else?

5 A. Not that I can recall in 2007.

6 Q. What efforts were made to sell Add A Zero
7 apparel in 2008?

8 A. In 2008, they were made available in the
9 bookstore. Also in 2008, we were redesigning our
10 website in the fall of -- I think the summer or
11 fall of 2008. And it was -- one of the things was
12 to have a store, an online store.

13 Q. Isn't it true that there were no pages
14 showing Add A Zero apparel on the website in 2008?

15 A. I believe that's correct.

16 Q. And, in fact, isn't it true that there
17 were no -- there was no Add A Zero merchandise
18 offered for sale on the website until after this
19 proceeding began?

20 A. That's correct.

21 Q. So there were no efforts to sell
22 Add A Zero merchandise on the website in 2008,
23 correct?

24 MR. YOUNG: Objection, mischaracterizes his

1 Q. It was after the date this proceeding was
2 commenced, correct?

3 A. Yes, I believe that to be true.

4 Q. Did the hours for the bookstore change in
5 any of the years 2006, '07, '08 or '09?

6 A. I believe the hours may have changed
7 because our service times changed.

8 Q. Who came up with the name Add A Zero?

9 A. Add A Zero -- and I believe that
10 question -- is that one of the ones that I'm
11 scheduled to answer on here?

12 Q. Do you know who came up with the name
13 Add A Zero?

14 A. The Add A Zero name came up as a concept
15 from a prophetic word that was spoken to the church
16 by a traveling evangelist from Zimbabwe, and the
17 product line itself was created or envisioned by
18 the senior pastor.

19 Q. So who came up with the name Add A Zero?
20 I'm not clear on your answer.

21 A. Okay. The words Add A Zero were stated in
22 a prophetic word that was given to the church, to
23 the senior pastors and to the church. So for the
24 product, the Add A Zero name was derived from that,

1 from the senior pastor.

2 Q. And who was that?

3 A. It would be Edward Logan.

4 Q. Did there come a time when Edward Logan
5 first spoke to you about using the Add A Zero name
6 in connection with the activities of the church?

7 A. Yes.

8 Q. When was that?

9 A. I don't recall the specific date.

10 Q. Was it in 2005, 2004?

11 A. It would have had to have been 2004.

12 Q. Do you recall if it was at the end of 2004
13 or earlier in 2004?

14 A. To the best of my recollection, it would
15 be the middle to the end of 2004.

16 Q. Okay. What did he tell you about the use
17 of the Add A Zero market at that time?

18 A. I was not the individual that was the
19 forerunner with the product. He primarily was
20 working with his secretary at that point. I got
21 involved when it got into the ordering process
22 primarily and once it was to be utilized for the
23 building fund campaign.

24 Q. Who was the secretary at that time?

1 A. Alisha Harris.

2 Q. Is she still working for the church at
3 this time?

4 A. No.

5 Q. When did she -- her employment end?

6 A. I believe in 2006. I'm not sure, but I
7 believe it was 2006. I would have to check her
8 employer records.

9 Q. Were the words Add A Zero ever used on
10 packaging for apparel?

11 A. No.

12 Q. Were the words Add A Zero used in
13 connection with other activities of the CFFC?

14 A. In support of the building fund campaign.

15 Q. How were the words Add A Zero used in
16 support of the building fund campaign?

17 A. It was utilized in a promotion to promote
18 the sale of the product and that the proceeds were
19 as always that they would go toward the paying off
20 of the land and the building that the church owned.

21 Q. That was existing land and building that
22 the church owned?

23 A. The land was purchased in 2005. The
24 church purchased 40 acres of land in 2005.

1 A. This is part of the prophetic utterance
2 that was mentioned by the guest pastor or
3 evangelist at this time when Add A Zero was first
4 mentioned.

5 Q. And is that the prophetic message that you
6 were referring to earlier in your testimony?

7 A. Yes, that is correct.

8 Q. Now, the top of the document, Exhibit 9 is
9 headed with the words, instructions for Add A Zero
10 relaunch, Brick and Mortar, 12-18-10, Microsoft
11 file. What do you mean by relaunch?

12 A. The Brick and Mortar campaign had been --
13 was launched at a previous time, so we were
14 relaunching it again just to bring another
15 awareness to the congregation, hey, we still have
16 debt out there that we want to retire, please
17 continue to give to the building fund campaign.

18 Q. Were you relaunching the use of the name
19 Add A Zero?

20 A. No, we were not relaunching the use of the
21 name Add A Zero. We were just relaunching the
22 campaign.

23 Q. Okay. Do you see the last paragraph, the
24 second sentence? Would you read that, please?

1 A. The purpose of the promo is to get the
2 people -- is to get people to start back buying the
3 Add A Zero apparel to support the building fund
4 campaign.

5 Q. What do you mean by that?

6 A. Well, the proceeds from the Add A Zero
7 apparel goes toward the -- goes toward the building
8 fund campaign. So the sales on the Add A Zero
9 apparel had been slow as well as we were
10 relaunching it, reenergizing the building fund
11 campaign to try to retire the debt which we had
12 tried to do previous. With the buildings that the
13 church owns, they were paid off in little under
14 five years.

15 So the same concept and process we tried
16 to do with the paying off of the 40 acres of land
17 that was purchased. And it has been a little bit
18 slow. We've had multiple campaigns. And so the
19 Brick and Mortar drive, we were trying to relaunch
20 that to reenergize people with the new year coming
21 up.

22 Pastor Logan normally does, you know,
23 vision casting for the next year, something at the
24 end of the year to try to get people energized for

1 the following year. And so with the Brick and
2 Mortar campaign and with the Add A Zero, hey,
3 let's, you know, that was part of the thing was
4 that apparel proceeds would go toward the campaign
5 as well.

6 Q. When had the building been paid off?

7 A. The building was paid off I believe in
8 March -- I believe 2002.

9 Q. 2002?

10 A. I believe so, somewhere around there.

11 Q. When you say that you wanted to get people
12 to start buying back the Add A Zero apparel, had
13 they stopped buying Add A Zero apparel?

14 A. Based on the sales records that we looked
15 at earlier, you can see that the sales were slow.

16 Q. So the answer is yes?

17 MR. YOUNG: Objection, mischaracterizes his
18 testimony.

19 BY MR. NOTARO:

20 Q. Had people stopped buying Add A Zero
21 apparel?

22 MR. YOUNG: Objection, asked and answered.

23 THE WITNESS: No. The apparel continues to be
24 sold now.

1 proceeding began.

2 Q. Where have CFFC Add A Zero products been
3 sold geographically?

4 A. In the state of Illinois. We also have
5 members of the church that live in Wisconsin which
6 is 15 minutes across the state line. And we also
7 are located near Great Lakes Naval Training Center,
8 and we have quite a few military personnel that
9 come, stay there for a couple years and travel all
10 over the world. So I guess one can assume if any
11 of that apparel has been purchased, it could be
12 anywhere from Japan to who knows where.

13 Q. But it's sold in this store, correct?

14 A. Yes, that's correct. It is sold in the
15 store.

16 Q. Is it sold anywhere outside of Illinois?

17 A. It is available on the website at this
18 time as well.

19 Q. All right. The website -- it was not
20 available on the website prior to this proceeding
21 being commenced, correct?

22 A. That is correct. It was not available, to
23 my knowledge.

24 Q. Has the Add A Zero ever been sold in

EXHIBIT B

OF CONOUR DECLARATION

ChristianFaithFellowshipChurchBookstore

Receipt Journal with Item Detail

Date: 1/1/2005 to 7/22/2011

Rep#	Date	Associate	Rept Tax	Rept Total
01290	1/9/2005	Yolanda	1.17	19.17
000488	61	II	Add-a -zero Caps	
01296	1/9/2005	Yolanda	10.21	167.21
000488	61	II	Add-a -zero Caps	
000490	61	II	Add-a-Zero Hooded	
000489	61	II	Add-a-Zero Crew	
01297	1/9/2005	Yolanda	3.25	53.25
000412	81	ANC	Best Is Yet To Come DVD	
000490	61	II	Add-a-Zero Hooded	
01309	1/12/2005	ELAINE	5.07	83.07
000488	61	II	Add-a -zero Caps	
000490	61	II	Add-a-Zero Hooded	
000490	61	II	Add-a-Zero Hooded	
01310	1/13/2005	ELAINE	2.80	45.80
000488	61	II	Add-a -zero Caps	
000489	61	II	Add-a-Zero Crew	
01311	1/13/2005	Heather	9.49	155.49
000489	61	II	Add-a-Zero Crew	
000490	61	II	Add-a-Zero Hooded	
000488	61	II	Add-a -zero Caps	
01312	1/13/2005	Heather	7.41	121.41
000488	61	II	Add-a -zero Caps	
000490	61	II	Add-a-Zero Hooded	
01314	1/13/2005	Heather	3.12	51.12
000490	61	II	Add-a-Zero Hooded	
000488	61	II	Add-a -zero Caps	
01315	1/13/2005	Heather	3.90	63.90
000490	61	II	Add-a-Zero Hooded	
01319	1/23/2005	mason	4.75	77.75
000488	61	II	Add-a -zero Caps	
000489	61	II	Add-a-Zero Crew	
000490	61	II	Add-a-Zero Hooded	
01320	1/23/2005	mason	1.17	19.17
000488	61	II	Add-a -zero Caps	
01321	1/23/2005	mason	5.07	83.07
000488	61	II	Add-a -zero Caps	

Receipt Journal with Item Detail

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Receipt#	Date	Associate	Receipt Tax	Receipt Total
000490	61	II Add-a-Zero Hooded		
000490	61	II Add-a-Zero Hooded		
01324	1/23/2005	Heather	1.95	31.95
000490	61	II Add-a-Zero Hooded		
01326	1/23/2005	Heather	1.17	19.17
000488	61	II Add-a-zero Caps		
01328	1/30/2005	mason	4.75	77.75
000488	61	II Add-a-zero Caps		
000489	61	II Add-a-Zero Crew		
000490	61	II Add-a-Zero Hooded		
01331	1/30/2005	mason	4.29	70.28
000777	11	KCP Year Mashela Stole Chrism		
000490	61	II Add-a-Zero Hooded		
000490	61	II Add-a-Zero Hooded		
01336	1/30/2005	ELAINE	1.17	19.17
000488	61	II Add-a-zero Caps		
01344	1/30/2005	ELAINE	1.92	31.52
000488	61	II Add-a-zero Caps		
000478	101	IH Sour Straws Strawberry		
000421	11	ANC Christ The Healer		
01345	1/30/2005	ELAINE	1.63	26.63
000489	61	II Add-a-Zero Crew		
01346	1/30/2005	ELAINE	1.17	19.17
000488	61	II Add-a-zero Caps		
01347	1/30/2005	ELAINE	1.63	26.63
000489	61	II Add-a-Zero Crew		
01351	1/30/2005	ELAINE	1.95	31.95
000490	61	II Add-a-Zero Hooded		
01353	1/30/2005	ELAINE	5.07	83.07
000490	61	II Add-a-Zero Hooded		
000490	61	II Add-a-Zero Hooded		
000488	61	II Add-a-zero Caps		
01354	1/30/2005	ELAINE	2.80	45.80
000489	61	II Add-a-Zero Crew		
000488	61	II Add-a-zero Caps		
01355	1/30/2005	ELAINE	3.12	51.12
000490	61	II Add-a-Zero Hooded		

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Receipt Journal with Item Detail					Associate	Rept Tax	Rept Total
Receipt#	Date						
000488	61	II	Add-a-zero Caps				
01363	2/2/2005		Yolanda	1.63		26.63	
000489	61	II	Add-a-Zero Crew				
01364	2/2/2005		Yolanda	1.63		26.63	
000489	61	II	Add-a-Zero Crew				
01375	2/4/2005		effezion	1.95		31.95	
000490	61	II	Add-a-Zero Hooded				
01616	2/20/2005		Heather	1.20		19.67	
000488	61	II	Add-a-zero Caps				
000443	101	IH	Candy Bars				
01619	2/20/2005		Heather	1.17		19.17	
000488	61	II	Add-a-zero Caps				
01620	2/20/2005		Heather	3.96		64.90	
000493	11	IPG	Fathering Spirit, The				
000490	61	II	Add-a-Zero Hooded				
000443	101	IH	Candy Bars				
01625	2/23/2005		ELAINE	2.34		38.34	
000488	61	II	Add-a-zero Caps				
000488	61	II	Add-a-zero Caps				
01626	2/23/2005		ELAINE	1.17		19.17	
000488	61	II	Add-a-zero Caps				
01627	2/23/2005		ELAINE	4.55		74.55	
000490	61	II	Add-a-Zero Hooded				
000489	61	II	Add-a-Zero Crew				
000493	11	IPG	Fathering Spirit, The				
01628	2/27/2005		mason	1.17		19.17	
000488	61	II	Add-a-zero Caps				
01629	2/27/2005		mason	1.17		19.17	
000488	61	II	Add-a-zero Caps				
01630	2/27/2005		Kathryn	1.95		31.95	
000490	61	II	Add-a-Zero Hooded				
01638	2/27/2005		Heather	1.20		19.67	
000488	61	II	Add-a-zero Caps				
000443	101	IH	Candy Bars				
01639	3/2/2005		ELAINE	2.93		47.93	
000493	11	IPG	Fathering Spirit, The				

Receipt Journal with Item Detail					Associate	Rept Tax	Rept Total
Receipt#	Date						
000490	61	II	Add-a-Zero Hooded				
01640	3/2/2005	ELAINE	1.95	31.95			
000490	61	II	Add-a-Zero Hooded				
01664	3/18/2005	mason	6.24	102.24			
000488	61	II	Add-a-zero Caps				
000488	61	II	Add-a-zero Caps				
000490	61	II	Add-a-Zero Hooded				
000490	61	II	Add-a-Zero Hooded				
01667	3/18/2005	mason	2.80	45.80			
000488	61	II	Add-a-zero Caps				
000489	61	II	Add-a-Zero Crew				
01668	3/18/2005	mason	1.63	26.63			
000489	61	II	Add-a-Zero Crew				
01675	3/5/2005	Kathryn	2.80	45.80			
000489	61	II	Add-a-Zero Crew				
000488	61	II	Add-a-zero Caps				
01676	3/5/2005	Kathryn	3.12	51.12			
000488	61	II	Add-a-zero Caps				
000490	61	II	Add-a-Zero Hooded				
01677	3/5/2005	Kathryn	3.12	51.12			
000488	61	II	Add-a-zero Caps				
000490	61	II	Add-a-Zero Hooded				
01678	3/5/2005	Kathryn	3.12	51.12			
000488	61	II	Add-a-zero Caps				
000490	61	II	Add-a-Zero Hooded				
01679	3/5/2005	Kathryn	3.12	51.12			
000488	61	II	Add-a-zero Caps				
000490	61	II	Add-a-Zero Hooded				
01680	3/5/2005	Kathryn	2.80	45.80			
000488	61	II	Add-a-zero Caps				
000489	61	II	Add-a-Zero Crew				
01681	3/5/2005	Kathryn	3.12	51.12			
000488	61	II	Add-a-zero Caps				
000490	61	II	Add-a-Zero Hooded				
01682	3/5/2005	Kathryn	2.80	45.80			
000489	61	II	Add-a-Zero Crew				
000488	61	II	Add-a-zero Caps				

Receipt Journal with Item Detail

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Receipt#	Date	Associate	Rept Tax	Rept Total
01683	3/5/2005	Kathryn	2.80	45.80
000489	61	II Add-a-Zero Crew		
000488	61	II Add-a-zero Caps		
				1.00 25.00 0.00
				1.00 18.00 0.00
01684	3/5/2005	Kathryn	2.80	45.80
000488	61	II Add-a-zero Caps		
000489	61	II Add-a-Zero Crew		
				1.00 18.00 0.00
				1.00 25.00 0.00
01685	3/5/2005	Kathryn	3.12	51.12
000488	61	II Add-a-zero Caps		
000490	61	II Add-a-Zero Hooded		
				1.00 18.00 0.00
				1.00 30.00 0.00
01686	3/5/2005	Kathryn	2.80	45.80
000489	61	II Add-a-Zero Crew		
000488	61	II Add-a-zero Caps		
				1.00 25.00 0.00
				1.00 18.00 0.00
01689	3/5/2005	Kathryn	2.80	45.80
000488	61	II Add-a-zero Caps		
000489	61	II Add-a-Zero Crew		
				1.00 18.00 0.00
				1.00 25.00 0.00
01690	3/5/2005	Kathryn	3.12	51.12
000488	61	II Add-a-zero Caps		
000490	61	II Add-a-Zero Hooded		
				1.00 18.00 0.00
				1.00 30.00 0.00
01691	3/5/2005	Kathryn	2.80	45.80
000489	61	II Add-a-Zero Crew		
000488	61	II Add-a-zero Caps		
				1.00 25.00 0.00
				1.00 18.00 0.00
01692	3/5/2005	Kathryn	2.80	45.80
000489	61	II Add-a-Zero Crew		
000488	61	II Add-a-zero Caps		
				1.00 25.00 0.00
				1.00 18.00 0.00
01693	3/5/2005	Kathryn	3.12	51.12
000488	61	II Add-a-zero Caps		
000490	61	II Add-a-Zero Hooded		
				1.00 18.00 0.00
				1.00 30.00 0.00
01694	3/5/2005	Kathryn	3.12	51.12
000490	61	II Add-a-Zero Hooded		
000488	61	II Add-a-zero Caps		
				1.00 30.00 0.00
				1.00 18.00 0.00
01695	3/5/2005	Kathryn	2.80	45.80
000489	61	II Add-a-Zero Crew		
000488	61	II Add-a-zero Caps		
				1.00 25.00 0.00
				1.00 18.00 0.00
01696	3/5/2005	Kathryn	3.12	51.12
000488	61	II Add-a-zero Caps		
000490	61	II Add-a-Zero Hooded		
				1.00 18.00 0.00
				1.00 30.00 0.00
01697	3/5/2005	Kathryn	2.80	45.80
000488	61	II Add-a-zero Caps		
				1.00 18.00 0.00

Receipt Journal with Item Detail					Associate		Receipt Tax	Receipt Total
Receipt#	Date							
000489	61	II	Add-a-Zero Crew					
01698	3/5/2005		Kathryn	2.80			45.80	
000488	61	II	Add-a-zero Caps					
000489	61	II	Add-a-Zero Crew					
01699	3/5/2005		Kathryn	3.12			51.12	
000488	61	II	Add-a-zero Caps					
000490	61	II	Add-a-Zero Hooded					
01701	3/5/2005		Kathryn	2.80			45.80	
000489	61	II	Add-a-Zero Crew					
000488	61	II	Add-a-zero Caps					
01702	3/5/2005		Kathryn	6.24			102.24	
000488	61	II	Add-a-zero Caps					
000488	61	II	Add-a-zero Caps					
000490	61	II	Add-a-Zero Hooded					
000490	61	II	Add-a-Zero Hooded					
01733	4/3/2005		Heather	1.17			19.17	
000488	61	II	Add-a-zero Caps					
01734	4/3/2005		Heather	2.80			45.80	
000488	61	II	Add-a-zero Caps					
000489	61	II	Add-a-Zero Crew					
01735	4/3/2005		Heather	3.25			53.20	
000490	61	II	Add-a-Zero Hooded					
000205	41	ANC	Messiah: Prophecy Fulfilled					
01737	4/3/2005		Heather	1.95			31.95	
000490	61	II	Add-a-Zero Hooded					
01759	4/24/2005		Heather	2.15			35.15	
000489	61	II	Add-a-Zero Crew					
000051	11	CFM	Disease Called Comparisoni					
01798	5/8/2005		ELAINE	1.17			19.17	
000488	61	II	Add-a-zero Caps					
02013	7/17/2005		Heather	3.12			51.12	
000490	61	II	Add-a-Zero Hooded					
000488	61	II	Add-a-zero Caps					
02029	7/24/2005		Heather	1.17			19.17	
000488	61	II	Add-a-zero Caps					
02068	8/14/2005		Kathryn	3.19			52.19	
000548	112	II	Add-a-zero Youth Tees					

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Receipt Journal with Item Detail

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Receipt#	Date	Associate	Receipt Tax	Receipt Total				
000547	112	II	Add-a-zero Adult Tees		1.00	13.00	0.00	
000547	112	II	Add-a-zero Adult Tees		1.00	13.00	0.00	
000547	112	II	Add-a-zero Adult Tees		1.00	13.00	0.00	
02069	8/14/2005	Kathryn	1.50	24.50				
000547	112	II	Add-a-zero Adult Tees		1.00	13.00	0.00	
000548	112	II	Add-a-zero Youth Tees		1.00	10.00	0.00	
02076	8/14/2005	Heather	0.85	13.85				
000547	112	II	Add-a-zero Adult Tees		1.00	13.00	0.00	
02080	8/14/2005	Heather	3.38	55.38				
000547	112	II	Add-a-zero Adult Tees		4.00	13.00	0.00	
02081	8/14/2005	Heather	0.85	13.85				
000547	112	II	Add-a-zero Adult Tees		1.00	13.00	0.00	
02082	8/14/2005	Kathryn	1.69	27.69				
000547	112	II	Add-a-zero Adult Tees		1.00	13.00	0.00	
000547	112	II	Add-a-zero Adult Tees		1.00	13.00	0.00	
02083	8/14/2005	Kathryn	2.54	41.54				
000547	112	II	Add-a-zero Adult Tees		1.00	13.00	0.00	
000547	112	II	Add-a-zero Adult Tees		1.00	13.00	0.00	
000547	112	II	Add-a-zero Adult Tees		1.00	13.00	0.00	
02084	8/14/2005	Kathryn	1.69	27.69				
000547	112	II	Add-a-zero Adult Tees		1.00	13.00	0.00	
000547	112	II	Add-a-zero Adult Tees		1.00	13.00	0.00	
02085	8/14/2005	Kathryn	3.19	52.19				
000548	112	II	Add-a-zero Youth Tees		1.00	10.00	0.00	
000547	112	II	Add-a-zero Adult Tees		1.00	13.00	0.00	
000547	112	II	Add-a-zero Adult Tees		1.00	13.00	0.00	
000547	112	II	Add-a-zero Adult Tees		1.00	13.00	0.00	
02086	8/14/2005	mason	1.50	24.50				
000548	112	II	Add-a-zero Youth Tees		1.00	10.00	0.00	
000547	112	II	Add-a-zero Adult Tees		1.00	13.00	0.00	
02087	8/14/2005	Kathryn	1.30	21.30				
000548	112	II	Add-a-zero Youth Tees		1.00	10.00	0.00	
000548	112	II	Add-a-zero Youth Tees		1.00	10.00	0.00	
02088	8/14/2005	Kathryn	0.85	13.85				
000547	112	II	Add-a-zero Adult Tees		1.00	13.00	0.00	
02089	8/14/2005	Kathryn	1.69	27.69				
000547	112	II	Add-a-zero Adult Tees		1.00	13.00	0.00	
000547	112	II	Add-a-zero Adult Tees		1.00	13.00	0.00	

Receipt Journal with Item Detail					
Receipt#	Date	Associate	Receipt Tax	Receipt Total	
02090	8/14/2005	Kathryn	4.68	76.68	
000547	112	II Add-a-zero Adult Tees			1.00 13.00 0.00
000547	112	II Add-a-zero Adult Tees			1.00 13.00 0.00
000548	112	II Add-a-zero Youth Tees			1.00 10.00 0.00
000548	112	II Add-a-zero Youth Tees			1.00 10.00 0.00
000547	112	II Add-a-zero Adult Tees			1.00 13.00 0.00
000547	112	II Add-a-zero Adult Tees			1.00 13.00 0.00
02091	8/14/2005	Kathryn	0.85	13.85	
000547	112	II Add-a-zero Adult Tees			1.00 13.00 0.00
02092	8/14/2005	Kathryn	1.69	27.69	
000547	112	II Add-a-zero Adult Tees			1.00 13.00 0.00
000547	112	II Add-a-zero Adult Tees			1.00 13.00 0.00
02093	8/14/2005	Kathryn	2.54	41.54	
000547	112	II Add-a-zero Adult Tees			1.00 13.00 0.00
000547	112	II Add-a-zero Adult Tees			1.00 13.00 0.00
000547	112	II Add-a-zero Adult Tees			1.00 13.00 0.00
02101	8/17/2005	Heather	1.53	25.14	
000547	112	II Add-a-zero Adult Tees			1.00 13.00 0.00
000548	112	II Add-a-zero Youth Tees			1.00 10.00 0.00
000477	101	IH Sour Straws			1.00 0.61 0.00
02102	8/17/2005	Heather	0.85	13.85	
000547	112	II Add-a-zero Adult Tees			1.00 13.00 0.00
02103	8/17/2005	Heather	0.85	13.85	
000547	112	II Add-a-zero Adult Tees			1.00 13.00 0.00
02104	8/17/2005	Heather	0.85	13.85	
000547	112	II Add-a-zero Adult Tees			1.00 13.00 0.00
02105	8/17/2005	Heather	1.69	27.69	
000547	112	II Add-a-zero Adult Tees			2.00 13.00 0.00
02107	8/17/2005	Heather	2.15	35.15	
000548	112	II Add-a-zero Youth Tees			2.00 10.00 0.00
000547	112	II Add-a-zero Adult Tees			1.00 13.00 0.00
02109	8/21/2005	Desi	2.86	46.80	
000547	112	II Add-a-zero Adult Tees			1.00 13.00 0.00
000547	112	II Add-a-zero Adult Tees			1.00 13.00 0.00
000186	11	ANC Faith That Prevails			1.00 3.99 0.00
000395	11	ANC Interceding Christian			1.00 3.95 0.00
000071	11	Prayer Confessions to Dominate			1.00 10.00 0.00
02130	8/24/2005	jones	0.85	13.85	

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Receipt Journal with Item Detail

Receipt#	Date	Associate	Item	Rept Tax	Rept Total
000547	112	II	Add-a-zero Adult Tees		
02149	9/4/2005	Heather		0.85	13.85
000547	112	II	Add-a-zero Adult Tees		
02156	9/14/2005	Jones		0.85	13.85
000547	112	II	Add-a-zero Adult Tees		
02205	10/16/2005	Yolanda		1.17	19.17
000488	61	II	Add-a-zero Caps		
02214	10/23/2005	Yolanda		1.63	26.63
000489	61	II	Add-a-Zero Crew		
02243	11/20/2005	Heather		1.17	19.17
000488	61	II	Add-a-zero Caps		
02245	11/20/2005	Heather		3.51	57.45
000452	11	ANC	Power of Prophecy		
000328	11	HCI	7 Best Things Happy Couples Do		
000490	61	II	Add-a-Zero Hooded		
02246	11/20/2005	Heather		1.69	27.69
000547	112	II	Add-a-zero Adult Tees		
02276	1/22/2006	Desi		1.63	26.63
000489	61	II	Add-a-Zero Crew		
02330	4/9/2006	Heather		1.17	19.17
000488	61	II	Add-a-zero Caps		
02339	4/23/2006	Jones		1.95	31.94
000547	112	II	Add-a-zero Adult Tees		
000186	11	ANC	Faith That Prevails		
02472	6/4/2006	Heather		0.33	5.33
000547	112	II	Add-a-zero Adult Tees		
02474	6/4/2006	Heather		0.36	5.83
000443	101	IH	Candy Bars		
000547	112	II	Add-a-zero Adult Tees		
02484	6/11/2006	Desi		1.95	31.95
000490	61	II	Add-a-Zero Hooded		
02519	6/18/2006	Yolanda		0.00	10.00
000547	112	II	Add-a-zero Adult Tees		
02520	6/18/2006	Yolanda		0.00	10.00
000547	112	II	Add-a-zero Adult Tees		

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Receipt Journal with Item Detail

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Receipt#	Date	Associate	Receipt Tax	Receipt Total
02540	6/25/2006	jones	1.69	27.69
000547	112	II Add-a-zero Adult Tees		
				2.00 13.00 0.00
02544	6/25/2006	jones	0.00	10.00
000547	112	II Add-a-zero Adult Tees		
				2.00 5.00 61.54
02545	6/25/2006	jones	0.00	10.00
000547	112	II Add-a-zero Adult Tees		
				2.00 5.00 61.54
02546	6/25/2006	jones	0.00	5.00
000547	112	II Add-a-zero Adult Tees		
				1.00 5.00 61.54
02548	6/25/2006	Heather	0.00	5.00
000547	112	II Add-a-zero Adult Tees		
				1.00 5.00 61.54
02578	7/23/2006	Desi	0.65	10.65
000547	112	II Add-a-zero Adult Tees		
				2.00 5.00 61.54
02583	7/23/2006	Desi	0.33	5.33
000547	112	II Add-a-zero Adult Tees		
				1.00 5.00 61.54
02643	8/27/2006	Heather	0.00	5.00
000547	112	II Add-a-zero Adult Tees		
				1.00 5.00 61.54
02654	8/27/2006	Yolanda	0.00	5.00
000547	112	II Add-a-zero Adult Tees		
				1.00 5.00 61.54
02811	10/22/2006	Desi	1.63	26.63
000489	61	II Add-a-Zero Crew		
				1.00 25.00 0.00
02828	10/22/2006	Desi	1.95	31.95
000490	61	II Add-a-Zero Hooded		
				1.00 30.00 0.00
03088	1/7/2007	Heather	1.95	31.95
000490	61	II Add-a-Zero Hooded		
				1.00 30.00 0.00
06809	8/30/2009	Heather	1.04	17.04
000489	61	II Add-a-Zero Crew		
				1.00 16.00 36.00
07747	12/19/2010	Bigby	6.05	99.05
000547	112	II Add-a-zero Adult Tees		
000489	61	II Add-a-Zero Crew		
000490	61	II Add-a-Zero Hooded		
				1.00 13.00 0.00
				2.00 25.00 0.00
				1.00 30.00 0.00
07772	1/30/2011	Sysadmin	1.75	26.75
000489	61	II Add-a-Zero Crew		
				1.00 25.00 0.00
07773	1/30/2011	Sysadmin	7.79	119.04
000547	112	II Add-a-zero Adult Tees		
				3.00 13.00 0.00

Receipt Journal with Item Detail				Associate	Receipt Tax	Receipt Total
Receipt#	Date					
000548	112	II	Add-a-zero Youth Tees			
000603	11	ANC	Gift and Award Bible - Purple			
000365	13	ANC	Comparative Study Bible			
000903	11	WNL	The Marking of Evil			
07774	1/30/2011		Sysadmin	2.52	38.52	
000548	112	II	Add-a-zero Youth Tees			
000547	112	II	Add-a-zero Adult Tees			
07775	1/30/2011		Sysadmin	3.85	58.85	
000490	61	II	Add-a-Zero Hooded			
000489	61	II	Add-a-Zero Crew			
07776	1/30/2011		Sysadmin	1.61	24.61	
000547	112	II	Add-a-zero Adult Tees			
000548	112	II	Add-a-zero Youth Tees			
07777	1/30/2011		Sysadmin	1.82	27.82	
000547	112	II	Add-a-zero Adult Tees			
07778	1/30/2011		Sysadmin	1.82	27.82	
000547	112	II	Add-a-zero Adult Tees			
07779	1/30/2011		Bigby	0.91	13.91	
000547	112	II	Add-a-zero Adult Tees			
07780	1/30/2011		Bigby	0.91	13.91	
000547	112	II	Add-a-zero Adult Tees			
07781	1/30/2011		Bigby	0.91	13.91	
000547	112	II	Add-a-zero Adult Tees			
07782	1/30/2011		Bigby	0.91	13.91	
000547	112	II	Add-a-zero Adult Tees			
07783	1/30/2011		Bigby	1.75	26.75	
000489	61	II	Add-a-Zero Crew			
07784	1/30/2011		Bigby	0.91	13.91	
000547	112	II	Add-a-zero Adult Tees			
07785	1/30/2011		Bigby	1.82	27.82	
000547	112	II	Add-a-zero Adult Tees			
07786	1/30/2011		Bigby	1.75	26.75	
000489	61	II	Add-a-Zero Crew			
07787	1/30/2011		Bigby	3.01	46.01	
000490	61	II	Add-a-Zero Hooded			
000547	112	II	Add-a-zero Adult Tees			

Receipt Journal with Item Detail				Associate		Rcpt Tax	Rcpt Total
Rcpt#	Date						
07786	1/30/2011	Bigby				3.85	58.85
000489	61	II	Add-a-Zero Crew				
000490	61	II	Add-a-Zero Hooded				
						1.00	25.00
						1.00	30.00
							0.00
							0.00
07789	1/30/2011	Bigby				3.01	46.01
000547	112	II	Add-a-zero Adult Tees				
000490	61	II	Add-a-Zero Hooded				
						1.00	13.00
						1.00	30.00
							0.00
							0.00
07790	1/30/2011	Bigby				8.12	124.12
000547	112	II	Add-a-zero Adult Tees				
000488	61	II	Add-a-zero Caps				
000489	61	II	Add-a-Zero Crew				
000490	61	II	Add-a-Zero Hooded				
						1.00	13.00
						1.00	18.00
						1.00	25.00
						2.00	30.00
							0.00
							0.00
07791	1/30/2011	Bigby				0.70	10.70
000548	112	II	Add-a-zero Youth Tees				
						1.00	10.00
07792	1/30/2011	Bigby				1.75	26.75
000489	61	II	Add-a-Zero Crew				
						1.00	25.00
07793	1/30/2011	Bigby				4.76	72.76
000490	61	II	Add-a-Zero Hooded				
000489	61	II	Add-a-Zero Crew				
000547	112	II	Add-a-zero Adult Tees				
						1.00	30.00
						1.00	25.00
						1.00	13.00
							0.00
							0.00
07794	1/30/2011	Heather				4.83	73.83
000488	61	II	Add-a-zero Caps				
000547	112	II	Add-a-zero Adult Tees				
000489	61	II	Add-a-Zero Crew				
						1.00	18.00
						2.00	13.00
						1.00	25.00
							0.00
							0.00
07795	1/30/2011	Heather				9.87	150.87
000490	61	II	Add-a-Zero Hooded				
000488	61	II	Add-a-zero Caps				
000777	51	ANC	13 Letters				
000566	81	EXM	The Truth Behind Hip Hop 3				
						2.00	30.00
						2.00	18.00
						1.00	15.00
						1.00	30.00
							0.00
							0.00
07796	1/30/2011	Heather				3.50	53.50
000489	61	II	Add-a-Zero Crew				
						2.00	25.00
07797	1/30/2011	Heather				5.25	80.25
000547	112	II	Add-a-zero Adult Tees				
000488	61	II	Add-a-zero Caps				
						3.00	13.00
						2.00	18.00
							0.00
							0.00
07798	1/30/2011	Heather				0.91	13.91
000547	112	II	Add-a-zero Adult Tees				
						1.00	13.00
07799	1/30/2011	Heather				3.36	51.35
000459	11	ANC	Song of Angels				
000490	61	II	Add-a-Zero Hooded				
						1.00	17.99
						1.00	30.00
							0.00
							0.00

Receipt Journal with Item Detail

Receipt#	Date	Associate	Receipt Tax	Receipt Total
07823	2/20/2011	Heather	2.87	43.87
000488	61	II Add-a-zero Caps		1.00 18.00 0.00
000547	112	II Add-a-zero Adult Tees		1.00 13.00 0.00
000548	112	II Add-a-zero Youth Tees		1.00 10.00 0.00
07825	2/20/2011	Bigby	0.91	13.91
000547	112	II Add-a-zero Adult Tees		1.00 13.00 0.00
07831	2/20/2011	Bigby	0.91	13.91
000547	112	II Add-a-zero Adult Tees		1.00 13.00 0.00
07834	2/23/2011	Heather	0.91	13.91
000547	112	II Add-a-zero Adult Tees		1.00 13.00 0.00
07836	2/23/2011	Heather	5.25	80.25
000490	61	II Add-a-Zero Hooded		1.00 30.00 0.00
000548	112	II Add-a-zero Youth Tees		2.00 10.00 0.00
000489	61	II Add-a-Zero Crew		1.00 25.00 0.00
07837	2/23/2011	Heather	0.70	10.70
000548	112	II Add-a-zero Youth Tees		1.00 10.00 0.00
07838	2/23/2011	Heather	2.45	37.45
000548	112	II Add-a-zero Youth Tees		1.00 10.00 0.00
000489	61	II Add-a-Zero Crew		1.00 25.00 0.00
07840	2/23/2011	Heather	0.91	13.91
000547	112	II Add-a-zero Adult Tees		1.00 13.00 0.00
07841	2/23/2011	Heather	1.82	27.82
000547	112	II Add-a-zero Adult Tees		2.00 13.00 0.00
07842	2/23/2011	Heather	1.26	19.26
000488	61	II Add-a-zero Caps		1.00 18.00 0.00
07843	2/24/2011	Bigby	0.91	13.91
000547	112	II Add-a-zero Adult Tees		1.00 13.00 0.00
07844	2/27/2011	Bigby	0.91	13.91
000547	112	II Add-a-zero Adult Tees		1.00 13.00 0.00
07848	2/27/2011	Bigby	3.92	62.92
000488	61	II Add-a-zero Caps		1.00 18.00 0.00
000547	112	II Add-a-zero Adult Tees		1.00 13.00 0.00
000398	23	IH Service CDs		1.00 3.00 0.00
000489	61	II Add-a-Zero Crew		1.00 25.00 0.00
07849	2/27/2011	Bigby	0.91	13.91
000547	112	II Add-a-zero Adult Tees		1.00 13.00 0.00

Receipt Journal with Item Detail

Receipt#	Date	Associate	Rept Tax	Rept Total
07850	2/27/2011	Bigby	3.01	46.01
000547 112	II	Add-a-zero Adult Tees		
000490 61	II	Add-a-zero Hooded		
			1.00	13.00
			1.00	30.00
				0.00
				0.00
07851	2/27/2011	Bigby	0.91	13.91
000547 112	II	Add-a-zero Adult Tees		
07856	2/27/2011	Bigby	0.93	14.17
000547 112	II	Add-a-zero Adult Tees		
000824 101	SAM	Peanuts - Small Bag		
			1.00	13.00
			1.00	0.23
				0.00
				0.00
07857	2/27/2011	Bigby	0.91	13.91
000547 112	II	Add-a-zero Adult Tees		
			1.00	13.00
				0.00
07858	2/27/2011	Bigby	6.02	92.02
000489 61	II	Add-a-zero Crew		
000488 61	II	Add-a-zero Caps		
			2.00	25.00
			2.00	18.00
				0.00
				0.00
07868	3/13/2011	Marjorie	1.76	26.97
000547 112	II	Add-a-zero Adult Tees		
000831 11	LBB	If God is So Good		
			1.00	13.00
			1.00	12.21
				0.00
				0.00
07869	3/13/2011	Marjorie	3.36	51.36
000488 61	II	Add-a-zero Caps		
000490 61	II	Add-a-zero Hooded		
			1.00	18.00
			1.00	30.00
				0.00
				0.00
07871	3/13/2011	Marjorie	3.22	49.22
000488 61	II	Add-a-zero Caps		
000548 112	II	Add-a-zero Youth Tees		
			2.00	18.00
			1.00	10.00
				0.00
				0.00
07873	3/13/2011	Marjorie	1.75	26.75
000489 61	II	Add-a-zero Crew		
			1.00	25.00
				0.00
07874	3/20/2011	Marjorie	2.31	35.31
000280 42	IH	Service DVDs		
000547 112	II	Add-a-zero Adult Tees		
			1.00	20.00
			1.00	13.00
				(185.71)
				0.00
07876	3/20/2011	Marjorie	3.64	55.64
000547 112	II	Add-a-zero Adult Tees		
000547 112	II	Add-a-zero Adult Tees		
			3.00	13.00
			1.00	13.00
				0.00
				0.00
07878	3/20/2011	Marjorie	0.91	13.91
000547 112	II	Add-a-zero Adult Tees		
			1.00	13.00
				0.00
07888	3/20/2011	Bigby	1.75	26.75
000489 61	II	Add-a-zero Crew		
			1.00	25.00
				0.00
07891	3/20/2011	Bigby	3.01	46.01
000489 61	II	Add-a-zero Crew		
000488 61	II	Add-a-zero Caps		
			1.00	25.00
			1.00	18.00
				0.00
				0.00

Receipt Journal with Item Detail

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Receipt#	Date	Associate	Receipt Tax	Receipt Total
07899	3/13/2011	Bigby	1.76	28.97
000547	112	II Add-a-zero Adult Tees		
000831	11	LBB If God is So Good		
			1.00	13.00
			1.00	12.21
				0.00
07900	3/23/2011	Bigby	0.91	13.91
000547	112	II Add-a-zero Adult Tees		
07901	3/23/2011	Bigby	2.73	41.73
000547	112	II Add-a-zero Adult Tees		
			3.00	13.00
				0.00
07902	3/23/2011	Bigby	0.91	13.91
000547	112	II Add-a-zero Adult Tees		
			1.00	13.00
				0.00
07904	3/25/2011	Sysadmin	0.91	13.91
000547	112	II Add-a-zero Adult Tees		
			1.00	13.00
				0.00
07905	3/25/2011	Sysadmin	0.91	13.91
000547	112	II Add-a-zero Adult Tees		
			1.00	13.00
				0.00
07906	3/27/2011	Bigby	1.26	19.26
000488	61	II Add-a-zero Caps		
			1.00	18.00
				0.00
07907	3/27/2011	Bigby	0.91	13.91
000547	112	II Add-a-zero Adult Tees		
			1.00	13.00
				0.00
07908	3/27/2011	Bigby	0.91	13.91
000547	112	II Add-a-zero Adult Tees		
			1.00	13.00
				0.00
07909	3/27/2011	Bigby	0.91	13.91
000547	112	II Add-a-zero Adult Tees		
			1.00	13.00
				0.00
07910	3/27/2011	Bigby	0.91	13.91
000547	112	II Add-a-zero Adult Tees		
			1.00	13.00
				0.00
07911	3/27/2011	Bigby	0.91	13.91
000547	112	II Add-a-zero Adult Tees		
			1.00	13.00
				0.00
07912	3/27/2011	Bigby	3.99	60.99
000547	112	II Add-a-zero Adult Tees		
000547	112	II Add-a-zero Adult Tees		
000488	61	II Add-a-zero Caps		
			1.00	13.00
			2.00	13.00
			1.00	18.00
				0.00
07913	3/27/2011	Bigby	0.91	13.91
000547	112	II Add-a-zero Adult Tees		
			1.00	13.00
				0.00
07914	3/27/2011	Bigby	3.08	47.02
000547	112	II Add-a-zero Adult Tees		
000490	61	II Add-a-zero Hooded		
000911	101	SAM Cheese/Peanut Butter Crackers		
			1.00	13.00
			1.00	30.00
			4.00	0.23
				0.00

Receipt Journal with Item Detail

07/29/11 1:30 PM

Receipt#	Date	Associate	Receipt Tax	Receipt Total
07916	3/27/2011	Bigby	1.82	27.82
000547	112	II Add-a-zero Adult Tees		
			2.00	13.00
				0.00
07917	3/27/2011	Bigby	0.91	13.91
000547	112	II Add-a-zero Adult Tees		
			1.00	13.00
				0.00
07918	3/27/2011	Bigby	1.75	26.75
000489	61	II Add-a-zero Crew		
			1.00	25.00
				0.00
07919	3/27/2011	Bigby	0.91	13.91
000547	112	II Add-a-zero Adult Tees		
			1.00	13.00
				0.00
07920	3/27/2011	Bigby	0.91	13.91
000547	112	II Add-a-zero Adult Tees		
			1.00	13.00
				0.00
07924	3/27/2011	Bigby	0.91	13.91
000547	112	II Add-a-zero Adult Tees		
			1.00	13.00
				0.00
07925	3/27/2011	Bigby	2.17	33.17
000547	112	II Add-a-zero Adult Tees		
000488	61	II Add-a-zero Caps		
			1.00	13.00
			1.00	18.00
				0.00
07926	3/27/2011	Bigby	0.70	10.70
000548	112	II Add-a-zero Youth Tees		
			1.00	10.00
				0.00
07927	3/27/2011	Bigby	0.75	11.46
000908	101	SAM Pistachios		
000824	101	SAM Peanuts - Small Bag		
000548	112	II Add-a-zero Youth Tees		
			1.00	0.47
			1.00	0.23
			1.00	10.00
				0.00
07929	3/27/2011	Bigby	1.26	19.26
000488	61	II Add-a-zero Caps		
			1.00	18.00
				0.00
07935	4/3/2011	Marjorie	2.10	32.10
000490	61	II Add-a-zero Hooded		
			1.00	30.00
				0.00
07957	4/17/2011	Jones	2.17	33.17
000488	61	II Add-a-zero Caps		
000547	112	II Add-a-zero Adult Tees		
			1.00	18.00
			1.00	13.00
				0.00
07960	4/17/2011	Jones	0.91	13.91
000547	112	II Add-a-zero Adult Tees		
			1.00	13.00
				0.00
07961	4/17/2011	Jones	0.91	16.91
000398	23	IH Service CDs		
000547	112	II Add-a-zero Adult Tees		
			1.00	3.00
			1.00	13.00
				0.00
07971	4/22/2011	Sysadmin	3.36	51.36
000547	112	II Add-a-zero Adult Tees		
			1.00	13.00
				0.00

Receipt Journal with Item Detail

07/29/11 1:30 PM

Receipt#	Date	Associate	ANC	Comparative Study Bible	Receipt Tax	Receipt Total
000365	13					
07972	4/22/2011	Sysadmin		1.75		26.75
000489	61	II		Add-a-Zero Crew		
07973	4/23/2011	Bigby		1.26		19.26
000488	61	II		Add-a-zero Caps		
07975	4/23/2011	Bigby		2.10		32.10
000490	61	II		Add-a-Zero Hooded		
07976	4/23/2011	Bigby		0.91		13.91
000547	112	II		Add-a-zero Adult Tees		
07979	4/27/2011	Heather		1.26		19.26
000488	61	II		Add-a-zero Caps		
07989	5/8/2011	Sysadmin		3.01		46.01
000547	112	II		Add-a-zero Adult Tees		
000548	112	II		Add-a-zero Youth Tees		
08008	5/25/2011	Heather		0.91		20.91
000547	112	II		Add-a-zero Adult Tees		
000280	42	IH		Service DVDs		
08016	5/29/2011	Heather		1.55		23.76
000831	11	LBB		If God is So Good		
000548	112	II		Add-a-zero Youth Tees		
08019	5/29/2011	Bigby		0.91		13.91
000547	112	II		Add-a-zero Adult Tees		
08052	6/26/2011	Bigby		0.91		13.91
000547	112	II		Add-a-zero Adult Tees		
08053	6/26/2011	Bigby		0.91		13.91
000547	112	II		Add-a-zero Adult Tees		
08061	7/3/2011	Heather		1.28		19.51
000488	61	II		Add-a-zero Caps		
000915	101	SAM		Quaker Chewy Granola Bar		

EXHIBIT C

OF CONOUR DECLARATION

References:
1 <http://www.webtransitions.com/five-requirements-for-success.asp>

ID	% Complete	Task Name	Duration	Start	Finish	Predecessors
1	0%	CFFC Website RoadMap	14.5 days?	Fri 10/3/08	Fri 10/17/08	
8	0%	The Design	14.5 days?	Fri 10/3/08	Fri 10/17/08	
9	0%	Contact Information	7.5 days	Fri 10/3/08	Fri 10/10/08	
10	0%	Define the team members to list	7.5 days	Fri 10/3/08	Fri 10/10/08	
11	0%	Site Map	0.38 days	Fri 10/3/08	Fri 10/3/08	
12	0%	Develop Site Map	14.5 days	Fri 10/3/08	Fri 10/17/08	
13	0%	Define the Main Navigation Items	14.5 days	Fri 10/3/08	Fri 10/17/08	
14	0%	Define the Sub Items	0.38 days	Fri 10/17/08	Fri 10/17/08	
15	0%	Email Functionality	14.5 days?	Fri 10/3/08	Fri 10/17/08	
16	0%	Define Mail Server to use	1.13 days	Fri 10/3/08	Sat 10/4/08	
17	0%	CFFC Mail Server	5 days	Mon 10/13/08	Fri 10/17/08	
18	0%	Elxio Mail Server	5 days	Mon 10/13/08	Fri 10/17/08	
19	0%	Define and create email addresses	14.5 days	Fri 10/3/08	Fri 10/17/08	
20	0%	How to manage?	10.5 days?	Fri 10/3/08	Mon 10/13/08	
21	0%	Administration	14.5 days	Fri 10/3/08	Fri 10/17/08	
22	0%	Create Policy Statements	14.5 days	Fri 10/3/08	Fri 10/17/08	
23	0%	Design Process - CFFC Site	14.25 days?	Fri 10/3/08	Fri 10/17/08	
24	0%	Phase I	14.25 days?	Fri 10/3/08	Fri 10/17/08	
25	0%	Home Page	10.5 days	Fri 10/3/08	Mon 10/13/08	
26	0%	Scrolling Picture	10.5 days	Fri 10/3/08	Mon 10/13/08	
27	0%	Video	3.75 days	Fri 10/3/08	Tue 10/7/08	
28	0%	Flash 1 - Multimedia	10.5 days	Fri 10/3/08	Mon 10/13/08	
29	0%	Flash 2- Events	10.5 days	Fri 10/3/08	Mon 10/13/08	
30	0%	Flash 3- Request Prayer	10.5 days	Fri 10/3/08	Mon 10/13/08	
31	0%	Menu Bar	14.25 days?	Fri 10/3/08	Fri 10/17/08	
32	0%	About us	10.5 days	Fri 10/3/08	Mon 10/13/08	
33	0%	Multimedia	3.75 days	Tue 10/14/08	Fri 10/17/08 28	
34	0%	Events	3.75 days	Tue 10/14/08	Fri 10/17/08 29	
35	0%	Contact	10.5 days	Fri 10/3/08	Mon 10/13/08	
36	0%	Request Prayer	3.75 days	Tue 10/14/08	Fri 10/17/08 30	
37	0%	Conference Call	3.5 days?	Fri 10/3/08	Mon 10/6/08	
38	0%	Phase II	0 days	Fri 10/3/08	Fri 10/3/08	
39	0%	Links	0 days	Fri 10/3/08	Fri 10/3/08	
40	0%	Ministries	0 days	Fri 10/3/08	Fri 10/3/08 39	

References:
1 <http://www.webtransitions.com/five-requirements-for-success.asp>

ID	% Complete	Task Name	Duration	Start	Finish	Predecessors
41	0%	Membership	0 days	Fri 10/3/08	Fri 10/3/08	
42	0%	Marketing	0 days	Fri 10/3/08	Fri 10/3/08	
43	0%	Resources	0 days	Fri 10/3/08	Fri 10/3/08	
44	0%	Church Announcements	0 days	Fri 10/3/08	Fri 10/3/08	
45	0%	Watch Live	0 days	Fri 10/3/08	Fri 10/3/08	
46	0%	Give On-Line	0 days	Fri 10/3/08	Fri 10/3/08	
47	0%	Phase III	0 days	Fri 10/3/08	Fri 10/3/08	
48	0%	Bible Study	0 days	Fri 10/3/08	Fri 10/3/08	
49	0%	Pod Cast	0 days	Fri 10/3/08	Fri 10/3/08 48	
50	0%	Sign-Up for Church News and Events	0 days	Fri 10/3/08	Fri 10/3/08	
51	0%	Scrolling Picutres	0 days	Fri 10/3/08	Fri 10/3/08	
52	0%	e-store	0 days	Fri 10/3/08	Fri 10/3/08	
53	0%	Partner Members	0 days	Fri 10/3/08	Fri 10/3/08	
54	0%	Phase IV	5.63 days	Fri 10/3/08	Thu 10/9/08	
55	0%	Devotional	0 days	Fri 10/3/08	Fri 10/3/08	
56	0%	Blog	0 days	Fri 10/3/08	Fri 10/3/08 55	
57	0%	Study Notes	0 days	Fri 10/3/08	Fri 10/3/08	
58	0%	E. James Logan Ministries	0 days	Fri 10/3/08	Fri 10/3/08	
59						
60						
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74						

EXHIBIT D

OF CONOUR DECLARATION

Craig Mason

From: CFFC ZION <cffczion@ameritech.net>
Sent: Thursday, December 09, 2004 3:54 PM
To: L. Denham; Elders Craig & Cheryl Mason
Subject: Add-A-Zero Prices

Lenel:

We would like to place the following order:

25 Embroidered Caps blk hat/silver letter and white trim - front/back
(15) Xl-Lg (10) sm/med @ 10.80 ea = \$270

25 Embroidered crew blk crew/silver letter and white trim - Upper left corner of the crew.
(3) 3x @ 15.75 = \$47.25 (10) 2x @ 13.75 = \$137.50 (7)-1X @ 13.75 = \$96.25 (5) Med @ 13.75 = \$68.75

25 Embroidered Hoodies blk hoody/silver letter and white trim - Upper left corner of the hoody.
(3) 3x @ \$18.25 = 54.75 (10) 2x @ 16.25 = \$162.50 (7)-1X @ 16.25 = \$113.75 (5) Med @ \$16.25 = \$81.25

\$412.25
349.75
270.00
\$1032.00 Total

This is my guesstimate of the total cost. Lenel has to check on the prices on the 3x's on the hoodies and crews. Lenel will need a 50% deposit to place order. I'm estimating it at \$516.00. Please Elder could you cut a check for Lenel tomorrow. If I'm short or over we will balance it on our final payment upon receipt of the product. I am not off at all I believe.

Sorry for the short notice Elder. I thought I had emailed him already and I hadn't.

Thanks
Alicia

Hello Alicia!

I'll take off \$2.00 on each if this will help?
I want to do business with the Church and would like to be a part of the Add-A-Zero plan.

Let me know what if anything I can do in this matter.

Lenel

----- Original Message -----

From: CFFC ZION
To: dlenel
Sent: Monday, November 29, 2004 10:18 AM
Subject: RE: Add-A-Zero Prices

Hi Lenel:

Were you able to get this prices reduced at all? Also you never submitted the artwork to us. We need it printed and also as a tiff or eps image.

EXHIBIT E

OF CONOUR DECLARATION

Christian Faith Fellowship Church
Add A Zero QBooks Report
 All Transactions

12:26 PM
 07/29/11
 Accrual Basis

Type	Date	Num	Name	Memo	Account	Amount	Balance
Check	7/21/2005	8140	Icon Industries	order for Add A Zero t-shirts & caps Purple- apparel for bookstore sal...	50001 · Other Mer...	1,648.75	1,648.75
Check	5/5/2005	7917	Icon Industries	Reorder for Add A Zero apparel for bookstore sales	50001 · Other Mer...	687.84	2,336.59
Check	3/4/2005	7761	Icon Industries	Reorder for Add A Zero apparel for bookstore sales	50001 · Other Mer...	620.32	2,956.91
Check	1/7/2005	7632	Icon Industries	Add A Zero cap and shirt order final payment	50001 · Other Mer...	516.00	3,472.91
Check	12/9/2004	7581	Icon Industries	Add A Zero cap and shirt order 1/2 down payment	50001 · Other Mer...	516.00	3,988.91
Check	10/28/2004	7471	Icon Industries	Add A Zero cap and shirt design samples	50001 · Other Mer...	178.90	4,167.81
Total						4,167.81	4,167.81

EXHIBIT F

OF CONOUR DECLARATION

Int. Cl.: 25

Prior U.S. Cls.: 22 and 39

United States Patent and Trademark Office

Reg. No. 3,173,207

Registered Nov. 21, 2006

TRADEMARK
PRINCIPAL REGISTER

ADD A ZERO

CHRISTIAN FAITH FELLOWSHIP CHURCH
(ILLINOIS CORPORATION)
1727 27TH STREET
ZION, IL 60099

THE MARK CONSISTS OF STANDARD CHAR-
ACTERS WITHOUT CLAIM TO ANY PARTICULAR
FONT, STYLE, SIZE, OR COLOR.

FOR: CLOTHING, NAMELY SHIRTS, PANTS
AND CAPS, IN CLASS. 25 (U.S. CLS. 22 AND 39).

SER. NO. 78-593,318, FILED 3-23-2005.

FIRST USE 1-9-2005; IN COMMERCE 1-9-2005.

PRISCILLA MILTON, EXAMINING ATTORNEY

EXHIBIT G

OF CONOUR DECLARATION

Int. Cl.: 25

Prior U.S. Cls.: 22 and 39

United States Patent and Trademark Office

Reg. No. 3,173,208

Registered Nov. 21, 2006

TRADEMARK
PRINCIPAL REGISTER



CHRISTIAN FAITH FELLOWSHIP CHURCH (IL-
LINOIS CORPORATION)
1727 27TH STREET
ZION, IL 60099

FIRST USE 1-9-2005; IN COMMERCE 1-9-2005.

SER. NO. 78-594,295, FILED 3-24-2005.

FOR: CLOTHING, NAMELY SHIRTS, PANTS
AND CAPS, IN CLASS 25 (U.S. CLS. 22 AND 39).

PRISCILLA MILTON, EXAMINING ATTORNEY

CFFC0142

EXHIBIT H

OF CONOUR DECLARATION

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In the Matter of Registration Nos. 3,173,207 and 3,173,208
For the mark ADD A ZERO and ADD A ZERO & Design

adidas AG,

Petitioner,

V.

Christian Faith Fellowship Church,

Respondent.

Cancellation No. 92053314

**NOTICE OF DEPOSITION OF
EDWARD LOGAN**

TO: Richard W. Young, Esq.
Quarles & Brady LLP
300 North LaSalle Street, Suite 4000
Chicago, Illinois 60654

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure, Petitioner adidas AG, will take the deposition of Edward Logan, commencing at 2:00 p.m. on March 1, 2012 at the offices of Veritext, 1 North LaSalle St., Suite 400, Chicago, Illinois 60602.

The deposition will be taken upon oral examination before an officer duly authorized to administer oaths and record the testimony by stenographic transcription.

Dated: January 30, 2012

Respectfully submitted,



Angelo Notaro

anotaro@notaromichalos.com

John Zaccaria

jzaccaria@notaromichalos.com

Notaro, Michalos & Zaccaria P.C.

100 Dutch Hill Road

Orangeburg, New York 10962

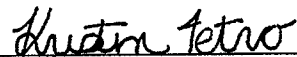
Tel: (845) 359-7700

Attorneys for Petitioner

CERTIFICATE OF SERVICE

It is hereby certified that a copy of the foregoing **NOTICE OF DEPOSITION OF EDWARD LOGAN** has been served by causing a copy thereof to be sent first class mail, postage prepaid, on January 30, 2012 addressed to:

Richard W. Young, Esq.
Quarles & Brady LLP
300 North LaSalle Street, Suite 4000
Chicago, Illinois 60654



Kristin Tetro

COPY

1 IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
2 BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD
3

4 In the matter of Registration Nos. 3,173,207 and
5 3,173,208 for the mark ADD A ZERO and
6 ADD A ZERO & DESIGN

7 ADIDAS AG,)
8 Petitioner,)
9 vs.) Cancellation
10 CHRISTIAN FAITH) No. 92053314
11 FELLOWSHIP CHURCH,)
12 Respondent.)
13

14 The deposition of EDWARD LOGAN, called for
15 examination taken pursuant to the provisions of the
16 Code of Civil Procedure and the Rules of the
17 Supreme Court of the State of Illinois pertaining
18 to the taking of depositions for the purpose of
19 discovery taken before RAELENE STAMM,
20 CSR No. 084-004445, Certified Shorthand Reporter
21 licensed by the State of Illinois, on the 1st day
22 of March, 2012, at One North LaSalle Street,
23 Suite 400, Chicago, Illinois, at the hour of
24 9:30 a.m.

1 and my wife. So the trademark Add A Zero was used
2 just for that, you know, we're still being added
3 to.

4 Q. What was going to be added to the church
5 and your wife and yourself?

6 A. Well, if you -- I think you do have some
7 of the apparel. There's a scripture on the back of
8 the hat, the cap, that says, God is going to
9 increase you and your family more and more. It's
10 more of a wholistic adding, not just financial, not
11 just health, it's the whole thing.

12 Q. And what -- did you explain that to the
13 congregation?

14 A. Absolutely.

15 Q. How did you explain that to the
16 congregation?

17 A. The same way I explained it to you, sir.

18 Q. And then beginning with the first time
19 that you explained this to the congregation, what
20 other times did you -- what other things did you do
21 to promote the Add A Zero campaign to the
22 congregation?

23 A. The Add A Zero caps, shirts are worn at
24 picnics, certain events, fourth Sundays, that kind

1 of thing.

2 Q. Was Add A Zero ever displayed within the
3 church?

4 A. In the bookstore.

5 Q. In the bookstore, okay.

6 Was it ever displayed on any video
7 display?

8 A. Yes.

9 Q. Where was the display, the video display?

10 A. In the main sanctuary.

11 Q. And can you describe how it was displayed
12 in the main sanctuary?

13 A. Can you be more specific?

14 Q. You said the Add A Zero was displayed, the
15 video display was in the main sanctuary, correct?

16 A. Correct.

17 Q. And the Add A Zero was displayed on the
18 video in the main sanctuary?

19 A. Yes.

20 Q. And what -- could you describe what was
21 displayed?

22 A. The cap and the shirt.

23 Q. Okay. Was it ever -- was the Add A Zero
24 ever used in any messages conveyed to the

EXHIBIT I

OF CONOUR DECLARATION

In the Matter of Registration Nos. 3,173,207 and 3,173,208
Mark: ADD A ZERO and ADD A ZERO & Design
Date of Registration: November 21, 2006

Cancellation No. 92053314

Nothing in these responses shall be construed as waiving rights or objections which otherwise may be available to Respondent, nor should Respondent's responses to any of the requests be deemed to be an admission of relevancy, materiality, or admissibility in evidence of either the interrogatories or the responses thereto.

The present responses are based upon and reflect only Respondent's present knowledge, information and belief. The responses may be subject to change, correction or amplification on the basis of further facts, information or circumstances which may come to Respondent's attention.

Respondent objects to the "Definitions and Instructions" as set forth in Petitioner's First Interrogatories Requests to the extent that they are inconsistent with or more stringent than the requirements of the Federal Rules of Civil Procedure.

Respondent objects to each of the Interrogatories to the extent that they are unlimited as to time. Respondent will respond to the Requests for the time period January 1, 2005 to November 23, 2010, the date of the filing of Petitioner's Petition for Cancellation.

Respondent objects to each of the Interrogatories to the extent that they seek disclosure of information protected by attorney-client privilege, work product immunity or any other applicable privilege or immunity.

Respondent objects to each of the Interrogatories to the extent that they seek the trade secrets or confidential business information of Respondent. Such information will be provided upon the issuance of a suitable protective order.

INTERROGATORIES

INTERROGATORY NO. 1

Has any change been made to Respondent's Website since January 1, 2007? If so, for each change:

- a. state the changes made to Respondent's Website;
- b. state the dates of such changes;
- c. identify all Documents which concern, refer or relate to the changes; and
- d. identify the Person most knowledgeable about the changes.

RESPONSE: Respondent objects to this request on the grounds that it is overly broad and burdensome and seeks information which is neither relevant nor likely to lead to the discovery of admissible evidence because the sole basis asserted for cancellation of Respondent's registrations is abandonment arising from alleged discontinuance of use combined with an intent not to resume use. The information sought by this request does not bear on discontinuance of use or intent not to resume use nor is the information sought likely to lead to the discovery of admissible evidence concerning discontinuance of use or intent not to resume use.

INTERROGATORY NO.2

Identify all Communications (documents and electronic) concerning Respondent's Website since January 1, 2007.

RESPONSE: Respondent objects to this request on the grounds that it is overly broad and burdensome and seeks information which is neither relevant nor likely to lead to the discovery of admissible evidence because the sole basis asserted for cancellation of Respondent's registrations is abandonment arising from alleged discontinuance of use

combined with an intent not to resume use. The information sought by this request does not bear on discontinuance of use or intent not to resume use nor is the information sought likely to lead to the discovery of admissible evidence concerning discontinuance of use or intent not to resume use.

INTERROGATORY NO.3

Identify, separately for each of Respondent's Trademarks, the first date that each of the said trademarks was displayed on Respondent's Website on or in connection with Respondent's Goods.

RESPONSE: December 2010

INTERROGATORY NO. 4

Identify all Web Hosts for Respondent's Website since January 1, 2007.

RESPONSE: Respondent objects to this request on the grounds that it seeks information which is neither relevant nor likely to lead to the discovery of admissible evidence because the sole basis asserted for cancellation of Respondent's registrations is abandonment arising from alleged discontinuance of use combined with an intent not to resume use. The information sought by this request does not bear on discontinuance of use or intent not to resume use nor is the information sought likely to lead to the discovery of admissible evidence concerning discontinuance of use or intent not to resume use.

INTERROGATORY NO. 5

Identify all Webmasters for Respondent's Website since January 1, 2007.

RESPONSE: Respondent objects to this request on the grounds that it seeks information which is neither relevant nor likely to lead to the discovery of admissible evidence because

the sole basis asserted for cancellation of Respondent's registrations is abandonment arising from alleged discontinuance of use combined with an intent not to resume use. The information sought by this request does not bear on discontinuance of use or intent not to resume use nor is the information sought likely to lead to the discovery of admissible evidence concerning discontinuance of use or intent not to resume use.

INTERROGATORY NO. 6

Identify the Person who maintains and operates the Web Server for Respondent's Website since January 1, 2007.

RESPONSE: Respondent objects to this request on the grounds that it seeks information which is neither relevant nor likely to lead to the discovery of admissible evidence because the sole basis asserted for cancellation of Respondent's registrations is abandonment arising from alleged discontinuance of use combined with an intent not to resume use. The information sought by this request does not bear on discontinuance of use or intent not to resume use nor is the information sought likely to lead to the discovery of admissible evidence concerning discontinuance of use or intent not to resume use.

INTERROGATORY NO. 7

Identify the first date that Respondent's Goods were offered for sale on Respondent's Website.

RESPONSE: Goods were available for sale on Respondent's website on the launch date (i.e. December 2010) of Respondent's new website.

INTERROGATORY NO. 8

Identify all Persons most knowledgeable about the display of Respondent's Goods on Respondent's Website.

RESPONSE: Craig R. Mason and Dawn Scholfield

INTERROGATORY NO.9

Identify the custodian of Backups of Respondent's Website.

RESPONSE: Respondent objects to this request on the grounds that it seeks information which is neither relevant nor likely to lead to the discovery of admissible evidence because the sole basis asserted for cancellation of Respondent's registrations is abandonment arising from alleged discontinuance of use combined with an intent not to resume use. The information sought by this request does not bear on discontinuance of use or intent not to resume use nor is the information sought likely to lead to the discovery of admissible evidence concerning discontinuance of use or intent not to resume use.

INTERROGATORY NO. 10

Identify all domain names which Respondent has ever owned or controlled.

RESPONSE: Respondent objects to this request on the grounds that it seeks information which is neither relevant nor likely to lead to the discovery of admissible evidence because the sole basis asserted for cancellation of Respondent's registrations is abandonment arising from alleged discontinuance of use combined with an intent not to resume use. The information sought by this request does not bear on discontinuance of use or intent not to resume use nor is the information sought likely to lead to the discovery of admissible evidence concerning discontinuance of use or intent not to resume use.

INTERROGATORY NO. 11

Identify all websites which Respondent has ever owned or controlled.

RESPONSE: Respondent objects to this request on the grounds that it seeks information

which is neither relevant nor likely to lead to the discovery of admissible evidence because the sole basis asserted for cancellation of Respondent's registrations is abandonment arising from alleged discontinuance of use combined with an intent not to resume use. The information sought by this request does not bear on discontinuance of use or intent not to resume use nor is the information sought likely to lead to the discovery of admissible evidence concerning discontinuance of use or intent not to resume use.

INTERROGATORY NO. 12

With respect to Respondent's Bookstore, identify:

- a. all Persons who worked in Respondent's Bookstore since January 1, 2007, including said person's job description and time period of work; and

RESPONSE: Heather Schooler
Raphael Bigby
Marjorie Hillard
Craig R. Mason
Sandra Jones

- b. the address of Respondent's Bookstore.

RESPONSE: 1727 27th Street, Zion, Illinois 60099

INTERROGATORY NO. 13

Identify all persons who prepared the sign bearing the terms "add a zero" shown in Exhibit B attached hereto.

RESPONSE: Alicia Harris

INTERROGATORY NO. 14

With respect to the photograph of Exhibit B, identify:

- a. the Person who took the photograph;

RESPONSE: Dawn Scholfield

- b. the date when the photograph was taken; and

RESPONSE: December 2010

- c. the Person most knowledgeable of the display of Respondent's Goods shown in the photograph of Exhibit B.

RESPONSE: Craig R. Mason

INTERROGATORY NO. 15

Identify the first date that Respondent's Goods were offered for sale in Respondent's Bookstore.

RESPONSE: January 2005

INTERROGATORY NO. 16

Identify the channels of trade in which Respondent's Goods have been offered for sale, distributed and sold in commerce by or for Respondent.

RESPONSE: Respondent objects to this request on the grounds that it seeks information which is neither relevant nor likely to lead to the discovery of admissible evidence because the sole basis asserted for cancellation of Respondent's registrations is abandonment arising from alleged discontinuance of use combined with an intent not to resume use. The information sought by this request does not bear on discontinuance of use or intent not to resume use nor is the information sought likely to lead to the discovery of admissible evidence concerning discontinuance of use or intent not to resume use.

INTERROGATORY NO. 17

Identify, separately for each of Respondent's Trademarks, the cities and states in which Respondent's Goods have been offered for sale, distributed and sold by or for Respondent for each year since January 1, 2005.

RESPONSE: Respondent objects to this request on the grounds that it seeks information which is neither relevant nor likely to lead to the discovery of admissible evidence because

the sole basis asserted for cancellation of Respondent's registrations is abandonment arising from alleged discontinuance of use combined with an intent not to resume use. The information sought by this request does not bear on discontinuance of use or intent not to resume use nor is the information sought likely to lead to the discovery of admissible evidence concerning discontinuance of use or intent not to resume use.

INTERROGATORY NO. 18

State in detail the manner in which Respondent's Trademarks have been used on or in connection with Respondent's Goods.

RESPONSE: Respondent objects to this request on the grounds that it seeks information which is neither relevant nor likely to lead to the discovery of admissible evidence because the sole basis asserted for cancellation of Respondent's registrations is abandonment arising from alleged discontinuance of use combined with an intent not to resume use. The information sought by this request does not bear on discontinuance of use or intent not to resume use nor is the information sought likely to lead to the discovery of admissible evidence concerning discontinuance of use or intent not to resume use.

INTERROGATORY NO. 19

State in detail the manner by which Respondent's Goods have been offered for sale, distributed and sold in commerce by or for Respondent.

RESPONSE: Respondent objects to this request on the grounds that it seeks information which is neither relevant nor likely to lead to the discovery of admissible evidence because the sole basis asserted for cancellation of Respondent's registrations is abandonment arising from alleged discontinuance of use combined with an intent not to resume use. The information sought by this request does not bear on discontinuance of use or intent not to

resume use nor is the information sought likely to lead to the discovery of admissible evidence concerning discontinuance of use or intent not to resume use.

INTERROGATORY NO. 20

For each of Respondent's Goods, identify all circulars, leaflets, brochures, pamphlets, bulletins, flyers, signs, sales displays, posters, point of purchase displays and other promotional material for such goods, which have been distributed or displayed in the United States by or on behalf of Respondent, and for each such item:

a. state each date on which or the inclusive dates during which said item was displayed or distributed and the manner in which said item was displayed or distributed; and

RESPONSE: Without waiving and subject to the general objections stated above, pursuant to Rule 33(d) of the Federal Rules of Civil Procedure, Respondent will produce non-privileged business records responsive to this interrogatory.

b. state the geographic area (by city and state) where said item or copies thereof were distributed or displayed.

RESPONSE: Respondent objects to this request on the grounds that it seeks information which is neither relevant nor likely to lead to the discovery of admissible evidence because the sole basis asserted for cancellation of Respondent's registrations is abandonment arising from alleged discontinuance of use combined with an intent not to resume use. The information sought by this request does not bear on discontinuance of use or intent not to resume use nor is the information sought likely to lead to the discovery of admissible evidence concerning discontinuance of use or intent not to resume use.

INTERROGATORY NO. 21

Identify the nature and title (if applicable) of the media, including, but not limited to, radio, television, print, *i.e.*, magazine, in which all advertisements of the Respondent's Goods have appeared, including the date of, and geographic scope (by city and state) of such advertisements.

RESPONSE: Without waiving and subject to the general objections stated above, pursuant to Rule 33(d) of the Federal Rules of Civil Procedure, Respondent will produce non-privileged business records responsive to this interrogatory.

INTERROGATORY NO. 22

State, separately for each year from January 1, 2005 to the present, Respondent's annual total sales, in units and dollars, separately for each of the Respondent's Goods sold under Respondent's Trademarks in the United States.

RESPONSE: Without waiving and subject to the general objections stated above, pursuant to Rule 33(d) of the Federal Rules of Civil Procedure, Respondent will produce non-privileged business records responsive to this interrogatory.

INTERROGATORY NO. 23

State separately for each year since January 1, 2005 to the present, Respondent's expenditures in advertising of Respondent's Goods.

RESPONSE: Without waiving and subject to the general objections stated above, pursuant to Rule 33(d) of the Federal Rules of Civil Procedure, Respondent will produce non-privileged business records responsive to this interrogatory.

INTERROGATORY NO. 24

State separately for each year since January 1, 2005 to the present, separately for each of Respondent's Goods, the unit volume obtained and/or purchased by or for Respondent.

RESPONSE: Without waiving and subject to the general objections stated above, pursuant to Rule 33(d) of the Federal Rules of Civil Procedure, Respondent will produce non-privileged business records responsive to this interrogatory.

INTERROGATORY NO. 25

Identify Persons most knowledgeable about the purchase of Respondent's Goods

by or for Respondent.

RESPONSE: Craig R. Mason

INTERROGATORY NO. 26

Identify all Persons who supplied Respondent's Goods to Respondent.

RESPONSE: Fas Art Services formerly Icon Industries; and

American Outfitters Ltd.

INTERROGATORY NO. 27

Identify Persons most knowledgeable about the sale of Respondent's Goods by or for Respondent.

RESPONSE: Craig R. Mason

INTERROGATORY NO. 28

Identify Persons most knowledgeable about the distribution of Respondent's Goods by or for Respondent.

RESPONSE: Craig R. Mason

INTERROGATORY NO. 29

Identify Persons most knowledgeable about advertising of Respondent's Goods by or for Respondent.

RESPONSE: Craig R. Mason

INTERROGATORY NO. 30

Identify Persons most knowledgeable about use of Respondent's Trademarks in connection with fundraising.

RESPONSE: Respondent objects to this request on the grounds that it seeks information which is neither relevant nor likely to lead to the discovery of admissible evidence because

the sole basis asserted for cancellation of Respondent's registrations is abandonment arising from alleged discontinuance of use combined with an intent not to resume use. The information sought by this request does not bear on discontinuance of use or intent not to resume use nor is the information sought likely to lead to the discovery of admissible evidence concerning discontinuance of use or intent not to resume use.

INTERROGATORY NO. 31

State whether a person named "Ora Brown" has ever worked for Respondent (either as an employee or volunteer). If so, state: last known telephone number and address of said person; job description; and time period during which said person worked for Respondent.

RESPONSE: Ora Brown is an employee of Respondent. Her work address is 1727 27th Street, Zion, Illinois 60099. The number is (847) 731-0700. The job description is provide administrative support to E. James Logan and Craig R. Mason. Ms. Brown has been employed by Respondent from January 10, 2005 to the present.

INTERROGATORY NO. 32

Identify each Person known by the name "LaBella" who has ever worked for Respondent (either as an employee or volunteer) and for each such Person state: job description; and time period during which each such Person worked or volunteered for Respondent.

RESPONSE: No person having the name "LaBella" has ever worked for Respondent.

INTERROGATORY NO. 33

For each of Respondent's Goods, state in detail all facts concerning any period of non-use of Respondent's Trademarks in the United States, including, but not limited to, the identity of each period of non-use and the reason for such non-use.

RESPONSE: Without waiving and subject to the foregoing general objections, Respondent states that there have been no periods of non-use of Respondents Trademarks except for use with pants.

INTERROGATORY NO. 34

What is the meaning of “add a zero”?

RESPONSE: Respondent objects to this request on the grounds that it seeks information which is neither relevant nor likely to lead to the discovery of admissible evidence because the sole basis asserted for cancellation of Respondent's registrations is abandonment arising from alleged discontinuance of use combined with an intent not to resume use. The information sought by this request does not bear on discontinuance of use or intent not to resume use nor is the information sought likely to lead to the discovery of admissible evidence concerning discontinuance of use or intent not to resume use.

INTERROGATORY NO. 35

What is the commercial impression of each of Respondent's Trademarks:
“add a zero” and



RESPONSE: Respondent objects to this request on the grounds that it seeks information which is neither relevant nor likely to lead to the discovery of admissible evidence because the sole basis asserted for cancellation of Respondent's registrations is abandonment arising from alleged discontinuance of use combined with an intent not to resume use. The information sought by this request does not bear on discontinuance of use or intent not to resume use nor is the information sought likely to lead to the discovery of admissible evidence concerning discontinuance of use or intent not to resume use.

INTERROGATORY NO. 36

State in detail all facts relating to the creation, adoption and use of the Respondent's Trademarks by or for Respondent, including, but not limited to, the identity of the Persons who created said trademarks, the reasons for adopting said trademarks, each different use of

said trademarks and the identity of the Persons most knowledgeable of such creation, adoption and use.

RESPONSE: Respondent objects to this request on the grounds that it seeks information which is neither relevant nor likely to lead to the discovery of admissible evidence because the sole basis asserted for cancellation of Respondent's registrations is abandonment arising from alleged discontinuance of use combined with an intent not to resume use. The information sought by this request does not bear on discontinuance of use or intent not to resume use nor is the information sought likely to lead to the discovery of admissible evidence concerning discontinuance of use or intent not to resume use.

INTERROGATORY NO. 37

Identify every trademark search which concerns, refers or relates to Respondent's Trademarks conducted by or for Respondent.

RESPONSE: Respondent objects to this request on the grounds that it seeks information which is neither relevant nor likely to lead to the discovery of admissible evidence because the sole basis asserted for cancellation of Respondent's registrations is abandonment arising from alleged discontinuance of use combined with an intent not to resume use. The information sought by this request does not bear on discontinuance of use or intent not to resume use nor is the information sought likely to lead to the discovery of admissible evidence concerning discontinuance of use or intent not to resume use.

INTERROGATORY NO. 38

Identify every opinion, legal or otherwise, requested or received by Respondent regarding the right to use and/or to register the Respondent's Trademarks.

RESPONSE: Respondent objects to this request on the grounds that it seeks information which is neither relevant nor likely to lead to the discovery of admissible evidence because

the sole basis asserted for cancellation of Respondent's registrations is abandonment arising from alleged discontinuance of use combined with an intent not to resume use. The information sought by this request does not bear on discontinuance of use or intent not to resume use nor is the information sought likely to lead to the discovery of admissible evidence concerning discontinuance of use or intent not to resume use.

INTERROGATORY NO. 39

Identify any studies, tests, or surveys which concern, refer or relate to consumer recognition of Respondent's Trademarks.

RESPONSE: Respondent objects to this request on the grounds that it seeks information which is neither relevant nor likely to lead to the discovery of admissible evidence because the sole basis asserted for cancellation of Respondent's registrations is abandonment arising from alleged discontinuance of use combined with an intent not to resume use. The information sought by this request does not bear on discontinuance of use or intent not to resume use nor is the information sought likely to lead to the discovery of admissible evidence concerning discontinuance of use or intent not to resume use.

INTERROGATORY NO. 40

Describe in detail each incident, known to Respondent, of actual confusion or mistake between Respondent or any of Respondent's Goods or packaging thereof, on the one hand, and Petitioner or any of Petitioner's products or packaging thereof, on the other hand and for each of said incidents described in response to this interrogatory, identify the Persons with most knowledge thereof.

RESPONSE: Respondent objects to this request on the grounds that it seeks information which is neither relevant nor likely to lead to the discovery of admissible evidence because the sole basis asserted for cancellation of Respondent's registrations is abandonment arising

from alleged discontinuance of use combined with an intent not to resume use. The information sought by this request does not bear on discontinuance of use or intent not to resume use nor is the information sought likely to lead to the discovery of admissible evidence concerning discontinuance of use or intent not to resume use.

INTERROGATORY NO. 41

Identify the custodian of records which concern, refer or relate to:

- a. the purchase of Respondent's Goods by or for Respondent;

RESPONSE: Craig R. Mason

- b. the sale and/or distribution of Respondent's Goods by or for Respondent;

RESPONSE: Craig R. Mason

- c. the advertising of Respondent's Goods by or for Respondent; and

RESPONSE: Craig R. Mason

- d. use of Respondent's Trademarks on Respondent's Website.

RESPONSE: Craig R. Mason

INTERROGATORY NO. 42

For each request of Petitioner's First Request for Admissions to Respondent that is not unqualifiedly admitted, please:

- a. State each fact upon which the Respondent relies to deny the admission; and

RESPONSE: Without waiving and subject to the general objections stated above, pursuant to Rule 33(d) of the Federal Rules of Civil Procedure, Respondent will produce non-

privileged business records responsive to this interrogatory.

b. Identify each person upon whom Respondent relies to deny the admission.

RESPONSE: Craig R. Mason

INTERROGATORY NO. 43

Identify each Person who prepared or aided in preparing answers to Petitioner's interrogatories and identify the interrogatories to which they aided in preparation.

RESPONSE:

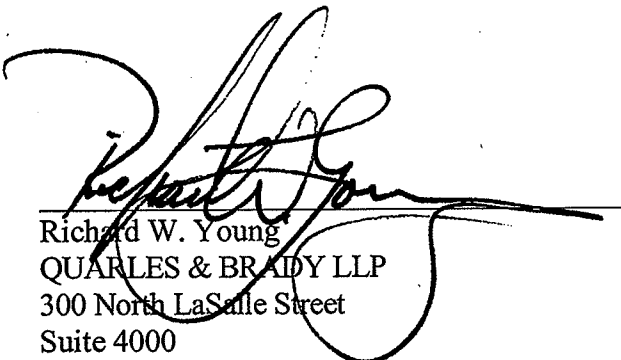
Craig R. Mason and Dawn Scholfield

INTERROGATORY NO. 44

Identify each Person who has supplied any information or assisted in locating documents or tangible things used in answering or responding to these Petitioner's interrogatories and document requests.

RESPONSE: Craig R. Mason and Dawn Scholfield

Dated: August 16, 2011



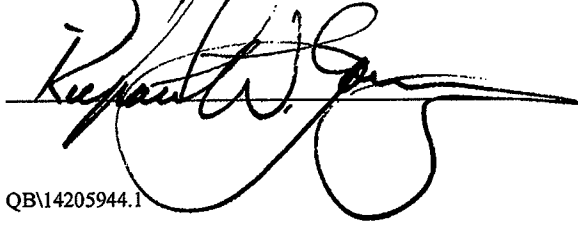
Richard W. Young
QUARLES & BRADY LLP
300 North LaSalle Street
Suite 4000
Chicago, Illinois 60654
(312) 715-5000
Attorney for Respondent

CERTIFICATE OF SERVICE

The undersigned attorney states that a copy of the foregoing ANSWER TO PETITIONER'S FIRST INTERROGATORIES TO RESPONDENT was served upon

Angelo Notaro
Notaro, Michalos & Zaccaria P.C.
100 Dutch Hill Road
Orangeburg, New York 10962

by depositing a copy thereof in the United States Mail, First Class, postage prepaid, this 16th day of August, 2011

A handwritten signature in black ink, appearing to read "Kupat W. G.", is written over a horizontal line. The signature is stylized and cursive.

QB\14205944.1